

Theodis Chapman
August 21, 2017

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANTHONY JORDAN, KENNETH)	
GREENLAW, THEODIS CHAPMAN,)	
and PATRICK NELSON, and a)	
class of unknown persons)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	No. 15 CV 5907
)	
TIMOTHY EVANS, CHIEF JUDGE)	Judge Sara Ellis
OF THE CIRCUIT COURT OF)	
COOK COUNTY, COOK COUNTY'S)	
JUVENILE PROBATION AND)	
COURT SERVICES DEPARTMENT,)	
MICHAEL ROHAN, CHARLES)	
YOUNG, ROSE MARIE GOLDEN,)	
WILLIAM PATTERSON and)	
UNKNOWN PERSONS,)	
)	
Defendants.)	

The deposition of THEODIS CHAPMAN,
called by the Defendants for examination, taken
pursuant to notice and pursuant to the Federal
Rules of Civil Procedure for the United States
District Courts pertaining to the taking of
depositions, taken before Donna Wadlington
Shavers, a Certified Shorthand Reporter, at 100
West Randolph Street, 13th Floor, Chicago,
Illinois, on the 21st day of August, 2017,
commencing at the hour of 10:00 a.m.

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<p style="text-align: right;">2</p> <p>1</p> <p>2 APPEARANCES:</p> <p>3</p> <p>4 DESPRES, SCHWARTZ & GEOGHEGAN, LTD.</p> <p>5 BY: THOMAS H. GEOGHEGAN, ESQ.</p> <p>6 77 West Washington Street, Suite 711</p> <p>7 Chicago, Illinois 60602-3271</p> <p>8 (312) 372-2511 Ext. 213</p> <p>9 tgeoghegan@dsgchicago.com</p> <p>10 Appeared on behalf of the Plaintiffs.</p> <p>11</p> <p>12</p> <p>13 OFFICE OF THE ATTORNEY GENERAL</p> <p>14 STATE OF ILLINOIS</p> <p>15 ATTORNEY GENERAL LISA MADIGAN</p> <p>16 BY: JOHN HAYES, ESQ.</p> <p>17 Assistant Attorney General</p> <p>18 100 West Randolph Street, 13th Floor</p> <p>19 Chicago, Illinois 60601</p> <p>20 (312) 814-5022</p> <p>21 jhayes@atg.state.il.us</p> <p>22 Appeared on behalf of the Defendants.</p> <p>23</p> <p>24</p>	<p style="text-align: right;">4</p> <p>1 (Witness duly sworn.)</p> <p>2 THEODIS CHAPMAN,</p> <p>3 called as a witness herein, having been first</p> <p>4 duly sworn, was examined and testified as</p> <p>5 follows:</p> <p>6 DIRECT EXAMINATION</p> <p>7 BY MR. HAYES:</p> <p>8 Q. Good morning, Mr. Chapman. My name is</p> <p>9 John Hayes. I'm representing the Defendant in</p> <p>10 this matter. I'm an Assistant Attorney General</p> <p>11 with the Attorney General's office.</p> <p>12 Could you state your name and</p> <p>13 spell it for the record, please.</p> <p>14 A. Theodis Chapman. T-h-e-o-d, as in</p> <p>15 David, i-s. Chapman, C-h-a-p, as in Paul,</p> <p>16 m-a-n.</p> <p>17 MR. HAYES: All right. Let the record</p> <p>18 reflect this is the deposition of Plaintiff,</p> <p>19 Theodis Chapman, in the case of Jordan, et al.,</p> <p>20 versus the Chief Judge of the Circuit Court of</p> <p>21 Cook County filed in the U.S. District Court for</p> <p>22 the Northern District of Illinois.</p> <p>23 The deposition is subject to</p> <p>24 all applicable federal rules.</p>
<p style="text-align: right;">3</p> <p>1 INDEX</p> <p>2 THEODIS CHAPMAN PAGE</p> <p>3 Direct by Mr. Hayes 5</p> <p>4</p> <p>5</p> <p>6</p> <p>7 EXHIBITS</p> <p>8 Chapman Deposition ID</p> <p>9 1 - Second Amended Complaint 44</p> <p>10 2 - 3/14/11 Memo from DCPO Donna Neal 158</p> <p>11 3 - Official Grievance Form 190</p> <p>12 4 - 11/23/15 Memo from Avik Das 191</p> <p>13 5 - 1/14/16 Memo from Kate Galbraith 191</p> <p>14 6 - 7/21/15 Memo from Cook County</p> <p>15 Juvenile Probation & Court Services</p> <p>16 Labor Management Team 194</p> <p>17 7 - Charge of Discrimination 216</p> <p>18 8 - Amended Charge of Discrimination 225</p> <p>19 9 - Interrogatories 248</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">5</p> <p>1 BY MR. HAYES:</p> <p>2 Q. All right. Mr. Chapman, I want to go</p> <p>3 over just a couple of ground rules.</p> <p>4 Have you ever been deposed</p> <p>5 before?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How many times?</p> <p>8 A. I don't know. It's been a while.</p> <p>9 Q. All right. Several? Like more than</p> <p>10 five?</p> <p>11 A. No.</p> <p>12 Q. All right. Less than five.</p> <p>13 When was the last time, if you</p> <p>14 remember?</p> <p>15 A. Let's see. My mom passed in 2009. So</p> <p>16 it had to be around two thousand and, I'm</p> <p>17 thinking, maybe '5 regarding my mom.</p> <p>18 Q. Okay.</p> <p>19 Were you ever the plaintiff in</p> <p>20 any of these depositions?</p> <p>21 A. No.</p> <p>22 Q. Okay. Were you the defendant in any</p> <p>23 of these depositions?</p> <p>24 A. Well, for my mom I would have been a</p>

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<p style="text-align: right;">6</p> <p>1 witness.</p> <p>2 Q. Okay.</p> <p>3 A. The others it's been so long I don't</p> <p>4 recall.</p> <p>5 Q. Okay. Were any of your depositions</p> <p>6 employment-related?</p> <p>7 A. I think it was more so -- I don't</p> <p>8 recall it being employment. It was more so, I</p> <p>9 think, accident where someone had hit me, I</p> <p>10 believe.</p> <p>11 Q. Okay.</p> <p>12 MR. GEOGHEGAN: You may want to speak</p> <p>13 up a little bit.</p> <p>14 THE WITNESS: Oh, I'm sorry.</p> <p>15 MR. HAYES: I will get to the nitty</p> <p>16 gritty and go over some ground rules.</p> <p>17 BY MR. HAYES:</p> <p>18 Q. Do you understand that you are under</p> <p>19 the same obligation to tell the truth today as</p> <p>20 you would in front of a judge or jury?</p> <p>21 A. Yes.</p> <p>22 Q. All right.</p> <p>23 And when you are talking and</p> <p>24 answering, the court reporter is going to take</p>	<p style="text-align: right;">8</p> <p>1 ask is that if there's a question pending you</p> <p>2 answer the question and then we can take a</p> <p>3 break.</p> <p>4 A. Yes.</p> <p>5 Q. Okay?</p> <p>6 A. Yes.</p> <p>7 Q. All right.</p> <p>8 Are you taking any medication</p> <p>9 that would affect your ability to testify today?</p> <p>10 A. No.</p> <p>11 Q. All right.</p> <p>12 Is there any reason at all</p> <p>13 that you can think you would not be able to</p> <p>14 testify truthfully today?</p> <p>15 A. No.</p> <p>16 Q. Okay.</p> <p>17 Outside of this lawsuit that</p> <p>18 we're here for today, have you ever filed a</p> <p>19 lawsuit previously?</p> <p>20 A. Yes.</p> <p>21 Q. And what was it?</p> <p>22 A. You want me to answer it in --</p> <p>23 Q. Let's --</p> <p>24 A. It was -- it was traffic-related</p>
<p style="text-align: right;">7</p> <p>1 down everything that we say. So we need to make</p> <p>2 sure we have a clear record.</p> <p>3 A. Okay.</p> <p>4 Q. It's a little stilted. So what I want</p> <p>5 you to do is wait for me to finish my question</p> <p>6 before you answer. Wait until I'm completely</p> <p>7 done. Don't try to anticipate where I'm going.</p> <p>8 And then I'll do the same thing. I will wait</p> <p>9 for you to completely finish your answer before</p> <p>10 I talk again. Okay?</p> <p>11 A. Sounds good.</p> <p>12 Q. All right. Also need you to be</p> <p>13 audible. We need yeses or noes.</p> <p>14 A. Okay.</p> <p>15 Q. So no nod or shaking. Do you</p> <p>16 understand that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. If you don't understand the</p> <p>19 question, tell me you don't understand it. I'll</p> <p>20 either repeat it or I'll try to rephrase it. Do</p> <p>21 you understand that?</p> <p>22 A. Yes.</p> <p>23 Q. All right. Breaks are fine. If you</p> <p>24 need to take a break, just let me know. All I</p>	<p style="text-align: right;">9</p> <p>1 again. There was -- someone had hit me.</p> <p>2 Q. Okay. And you took them to court?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And when was that?</p> <p>5 A. I believe 2005, I believe it was.</p> <p>6 Q. Okay. Did that go to trial?</p> <p>7 A. No. They went ahead and settled.</p> <p>8 Q. All right. Any other besides that</p> <p>9 one?</p> <p>10 A. No. The previous one before that was</p> <p>11 2000 where someone hit me in 2000. But it --</p> <p>12 again, it was settled.</p> <p>13 Q. Okay. Other than those two lawsuits,</p> <p>14 any other ones?</p> <p>15 A. No.</p> <p>16 Q. Besides this one?</p> <p>17 A. Yes.</p> <p>18 Q. Okay.</p> <p>19 What did you do to prepare for</p> <p>20 your deposition today?</p> <p>21 A. Got a good night's sleep.</p> <p>22 Q. Did you meet with your attorney?</p> <p>23 A. Not today.</p> <p>24 Q. Okay. Did you meet with him</p>

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<p style="text-align: right;">10</p> <p>1 previously in preparation for this deposition?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. When?</p> <p>4 A. Friday.</p> <p>5 Q. Okay. For approximately how long?</p> <p>6 A. Maybe two hours.</p> <p>7 Q. Was anyone else there?</p> <p>8 A. No.</p> <p>9 Q. All right.</p> <p>10 Did you speak with anyone else</p> <p>11 other than your attorney about this deposition</p> <p>12 today?</p> <p>13 A. My pastor.</p> <p>14 Q. Okay. And what's his or her name?</p> <p>15 A. Reverend Dale A. Lawson. Reverend Dr.</p> <p>16 Dale A. Lawson, Sr.</p> <p>17 Q. Okay. And what did you talk to</p> <p>18 Reverend Lawson about?</p> <p>19 A. He prayed for me.</p> <p>20 Q. Okay. Was this yesterday?</p> <p>21 A. Yes. Sunday.</p> <p>22 Q. All right. Okay.</p> <p>23 Anyone else you talked to</p> <p>24 about your deposition today?</p>	<p style="text-align: right;">12</p> <p>1 Q. Okay.</p> <p>2 Did you speak to any of your</p> <p>3 co-workers about your deposition?</p> <p>4 A. They already know.</p> <p>5 Q. Okay. So you didn't specifically talk</p> <p>6 to any of your co-workers about the deposition?</p> <p>7 A. No.</p> <p>8 Q. All right.</p> <p>9 Did you review any documents</p> <p>10 in preparation for your deposition today?</p> <p>11 A. Just the interrogatories.</p> <p>12 Q. Okay. We'll go over those.</p> <p>13 All right. Let's talk a</p> <p>14 little bit just about your background,</p> <p>15 Mr. Chapman. What is your date of birth?</p> <p>16 A. 3/12/69.</p> <p>17 Q. All right.</p> <p>18 And this is obvious based on</p> <p>19 your lawsuit, but what is your race?</p> <p>20 A. Black.</p> <p>21 Q. All right.</p> <p>22 How far have you gone in</p> <p>23 school?</p> <p>24 A. Master's degree. I was a doctoral</p>
<p style="text-align: right;">11</p> <p>1 A. My family.</p> <p>2 Q. Okay.</p> <p>3 Are you married?</p> <p>4 A. Yes.</p> <p>5 Q. I won't get too much into detail.</p> <p>6 Does your wife work?</p> <p>7 A. Yes.</p> <p>8 Q. For the State or --</p> <p>9 A. No.</p> <p>10 Q. -- government? Okay.</p> <p>11 Do you have children?</p> <p>12 A. Yes.</p> <p>13 Q. How many?</p> <p>14 A. One.</p> <p>15 Q. All right. How old?</p> <p>16 A. Twenty-four.</p> <p>17 Q. All right. And does that child work</p> <p>18 for the State or any other governmental entity?</p> <p>19 A. No.</p> <p>20 Q. Okay.</p> <p>21 Outside of your family did you</p> <p>22 speak to anyone else about your deposition</p> <p>23 today?</p> <p>24 A. No.</p>	<p style="text-align: right;">13</p> <p>1 candidate.</p> <p>2 Q. What is your master's degree in?</p> <p>3 A. Political and justice studies.</p> <p>4 Q. When did you receive that degree?</p> <p>5 A. 2003.</p> <p>6 Q. Okay. And where?</p> <p>7 A. Governors State University.</p> <p>8 Q. Okay. Where did you go for undergrad?</p> <p>9 A. Alabama State University.</p> <p>10 Q. And when did you graduate there?</p> <p>11 A. '97.</p> <p>12 Q. All right. And what was your degree</p> <p>13 from Alabama State?</p> <p>14 A. Bachelor's degree of social work.</p> <p>15 Q. Okay.</p> <p>16 Any other degrees; advanced</p> <p>17 degrees?</p> <p>18 A. No.</p> <p>19 Q. Okay. When did you -- have you ever</p> <p>20 been convicted of a felony?</p> <p>21 A. No.</p> <p>22 Q. When you first started working with</p> <p>23 the JPD -- I'll -- I'll either call it JPD or</p> <p>24 the Juvenile Probation Department. You know</p>

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<p style="text-align: right;">14</p> <p>1 what I'm referring to?</p> <p>2 A. The acronym. I got you.</p> <p>3 Q. Okay. When did you start working for</p> <p>4 the JPD?</p> <p>5 A. 2003.</p> <p>6 Q. All right.</p> <p>7 Was that after you received</p> <p>8 your master's?</p> <p>9 A. Yes.</p> <p>10 Q. And what position did you first --</p> <p>11 sorry. Strike that.</p> <p>12 What position did you start in</p> <p>13 with the JPD?</p> <p>14 A. You mean when I became employed?</p> <p>15 Q. In 2003. Yes.</p> <p>16 A. I was recruited to be a Jumpstart</p> <p>17 instructor.</p> <p>18 Q. When you say "recruited," how were you</p> <p>19 recruited?</p> <p>20 A. I had previously supervised a program</p> <p>21 called ERC.</p> <p>22 Q. What does that stand for?</p> <p>23 A. Evening Reporting Center where I was</p> <p>24 employed with Aunt Martha's Youth Services.</p>	<p style="text-align: right;">16</p> <p>1 A. It's a detention alternative program.</p> <p>2 Q. What does that mean?</p> <p>3 A. Well, in lieu of the minors being</p> <p>4 locked up in the detention center, they would be</p> <p>5 allowed to remain at home, and then they would</p> <p>6 be picked up and brought to the center around</p> <p>7 the time that they are most likely to</p> <p>8 recidivate, which is the evening time, 4:00 to</p> <p>9 8:00 p.m.</p> <p>10 And usually between that time</p> <p>11 and their next court date they would be at the</p> <p>12 program, which would usually entail about 60</p> <p>13 days.</p> <p>14 Q. Okay. Prior to working at the ERC,</p> <p>15 where did you work?</p> <p>16 A. I was still at Aunt Martha's, but I</p> <p>17 was in a different position. Prior to the</p> <p>18 promotion to supervisor, I worked in DCFS</p> <p>19 placement stabilization.</p> <p>20 Q. Why don't you tell me what's Aunt</p> <p>21 Martha's.</p> <p>22 A. Aunt Martha's Youth Services is</p> <p>23 probably one of the biggest social services</p> <p>24 agencies in Illinois, and they do a lot of</p>
<p style="text-align: right;">15</p> <p>1 Q. Okay.</p> <p>2 A. And I got a lot of critical acclaim</p> <p>3 from the Casey Foundation for the way the center</p> <p>4 operated.</p> <p>5 Q. How long had you been working in that</p> <p>6 position?</p> <p>7 A. For Evening Reporting Center? From, I</p> <p>8 want to say, ninety -- about four years.</p> <p>9 Q. Okay. Around '99?</p> <p>10 A. '99. Yeah. Around '99.</p> <p>11 Q. Was that a full-time job?</p> <p>12 A. Yes.</p> <p>13 Q. And what were your duties at the</p> <p>14 Evening Reporting Center?</p> <p>15 A. Supervise the Evening Reporting</p> <p>16 Center; facilitated the programs; the kids were</p> <p>17 given tutoring, they were given mentoring; guest</p> <p>18 speakers; outings; cultural enrichment.</p> <p>19 Q. You said you were supervising. Who</p> <p>20 were you supervising?</p> <p>21 A. I supervised from three to four</p> <p>22 employees.</p> <p>23 Q. And what -- I guess, what was the</p> <p>24 purpose of the ERC?</p>	<p style="text-align: right;">17</p> <p>1 contractual work with probation, as well as</p> <p>2 DCFS, as well as, I think, IDHS now.</p> <p>3 Q. And did you start there after college?</p> <p>4 A. Yes.</p> <p>5 Q. All right. So '97? Does that sound</p> <p>6 right?</p> <p>7 A. Yes.</p> <p>8 Q. All right.</p> <p>9 Let's go back up to the JPD.</p> <p>10 Again, you said you were recruited. Who</p> <p>11 recruited you?</p> <p>12 A. There was some instances where some of</p> <p>13 the ERC's that I helped through Aunt Martha's to</p> <p>14 open up, and there was one on the west side</p> <p>15 also. And I got my work with the judges because</p> <p>16 I would actually be requested to come to court</p> <p>17 on behalf of some of the kids that actually</p> <p>18 finished the program, and for whatever reason,</p> <p>19 DCPO Steve Eisman --</p> <p>20 Q. What does DCPO stand for?</p> <p>21 A. Deputy chief probation officer.</p> <p>22 Q. So just for the record, I'm going to</p> <p>23 ask probably a lot of acronyms --</p> <p>24 A. That's fine.</p>

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<p style="text-align: right;">18</p> <p>1 Q. -- because I know --</p> <p>2 A. That's fine.</p> <p>3 Q. -- we use a ton of them.</p> <p>4 A. That's fine. Yeah. That's fine.</p> <p>5 Q. All right.</p> <p>6 A. And I had the pleasure of meeting</p> <p>7 different individuals throughout probation,</p> <p>8 including judges and including Mr. Eisman. And</p> <p>9 I also interned at juvenile probation and --</p> <p>10 during my -- you know, my work with my master's</p> <p>11 degree. And I was asked to intern in the</p> <p>12 Jumpstart program, which is where I did my</p> <p>13 internship.</p> <p>14 Q. Okay. Well, let's unpack that a</p> <p>15 little bit.</p> <p>16 When did you intern at the JP?</p> <p>17 A. I graduated in 2003, so it was around</p> <p>18 2002. It was a year. It was a year internship.</p> <p>19 Q. Okay. And what exactly did you do in</p> <p>20 that internship?</p> <p>21 A. I engaged the minors, did groups --</p> <p>22 Q. What does that mean by "engaging the</p> <p>23 minors?"</p> <p>24 A. Engage the minors meaning the kids --</p>	<p style="text-align: right;">20</p> <p>1 A. It was 95 percent in Jumpstart, and I</p> <p>2 was also able to see other aspects of juvenile</p> <p>3 court as well.</p> <p>4 Q. Okay. And what were the other</p> <p>5 aspects?</p> <p>6 A. IPS, EM.</p> <p>7 Q. What's IPS?</p> <p>8 A. I'm sorry.</p> <p>9 Q. It's all right.</p> <p>10 A. Intensive probation services.</p> <p>11 Q. Okay. What does that mean?</p> <p>12 A. It's when a minor has almost exhausted</p> <p>13 all of the other remedies that the court has and</p> <p>14 so they are pretty much one step away from the</p> <p>15 adult or sent to IDJJ in this case, which is</p> <p>16 like the adult for juveniles.</p> <p>17 Q. Prison, right, for juveniles?</p> <p>18 A. Yes.</p> <p>19 Q. Essentially, right?</p> <p>20 A. Essentially.</p> <p>21 Q. Okay. All right. And so IPS you</p> <p>22 said. What else?</p> <p>23 A. EM, electronic monitoring.</p> <p>24 Q. Okay. That's self-explanatory. What</p>
<p style="text-align: right;">19</p> <p>1 I guess, do you need a little, small synopsis of</p> <p>2 what Jumpstart is? Or are you okay?</p> <p>3 Q. We can do it now. Yeah. Go ahead.</p> <p>4 A. Or you got to get to it with the</p> <p>5 interrogatories. Either way.</p> <p>6 Q. No, no. Go ahead.</p> <p>7 A. They're -- the youth that are in</p> <p>8 Jumpstart have had difficulties in traditional</p> <p>9 school settings. Some of these difficulties</p> <p>10 sometimes entails family dynamics where they may</p> <p>11 come from violent homes, homes where they are</p> <p>12 impoverished. Whatever the case may be, it</p> <p>13 affected their ability to receive a formal</p> <p>14 education in a normal school setting.</p> <p>15 So I engage those minors in</p> <p>16 specific groups that address some of those</p> <p>17 issues. I created an actual survey for the</p> <p>18 program, which allowed the minors to give a</p> <p>19 before and after when they first came into the</p> <p>20 program and to engage what they learned by the</p> <p>21 time they completed the program.</p> <p>22 Q. All right.</p> <p>23 So your internship in 2002,</p> <p>24 was that solely in the Jumpstart program?</p>	<p style="text-align: right;">21</p> <p>1 else?</p> <p>2 A. Drug unit.</p> <p>3 Q. What's the drug unit?</p> <p>4 A. Drug unit is where minors that have</p> <p>5 a -- a substance abuse issue. And that</p> <p>6 specialized unit works on addressing some of</p> <p>7 those issues that are underlining which are</p> <p>8 causing the minor, in addition to utilizing</p> <p>9 drugs, to reoffend.</p> <p>10 Q. Anything else?</p> <p>11 A. EM. I want to say I did -- I went out</p> <p>12 in the district with some field officers, and</p> <p>13 that's the current position I'm in now.</p> <p>14 Q. Field probation officers?</p> <p>15 A. Field probation officers. Yes.</p> <p>16 Q. Okay.</p> <p>17 While you were an intern, did</p> <p>18 you receive any type of training in any of these</p> <p>19 units?</p> <p>20 A. Just from where I observed. It's all</p> <p>21 training as you observe. You're given an</p> <p>22 in-depth look at what entails the duties, the</p> <p>23 day-to-day, things that you wouldn't otherwise</p> <p>24 learn in a classroom.</p>

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<p style="text-align: right;">22</p> <p>1 Q. And you did that for about a year; is 2 that right? 3 A. Yes. 4 Q. Okay. 5 Do you remember the specific 6 date when you were first hired in 2003 with the 7 JPD? 8 A. I believe it was April 7th, I believe. 9 Q. So April 2003 sounds right? 10 A. (No audible response.) 11 Q. And what was your first position with 12 the Juvenile Probation Department? 13 A. Jumpstart instructor. 14 Q. Tell me what that -- what the duties 15 of Jumpstart instructor entailed. 16 A. The duties include engaging those 17 minors that have been disconnected from 18 traditional school settings and also have a high 19 propensity to recidivate; creating an atmosphere 20 where they can be sort of reconditioned as to 21 what a student entails, knowing how to ask 22 questions, how to function in the classroom; 23 addressing some of the behavioral issues; using 24 positive reinforcement; breaking things down to</p>	<p style="text-align: right;">24</p> <p>1 them have even had individuals in the same room 2 that had shot at each other. But for the first 3 time, people got a chance to see these kids walk 4 out of the building, actually, as kids should. 5 And then they would be reintegrated with the 6 traditional school in the neighborhood. 7 Q. What was the outreach component? 8 A. The outreach component is once they 9 are done with the classroom component, they 10 would then be reconnected with a traditional 11 school near their neighborhood. And then we 12 would monitor them on a week-by-week basis to 13 assist with the transition. 14 Q. While you were an instructor, were you 15 involved in the outreach component? 16 A. Yes. Yes. 17 Q. All right. 18 When you started in 2003, how 19 many -- if you know, how many total Jumpstart 20 instructors were there? 21 A. That have come and gone or -- 22 Q. Just when you started in 2003, how 23 many were there? 24 A. There were --</p>
<p style="text-align: right;">23</p> <p>1 them almost -- because many of them were like at 2 a -- between a first and third grade level. So 3 the -- they needed academic remediation. 4 Q. And where was this done at? 5 A. On the third floor in the Juvenile 6 Probation Department, not in the TDC, which is a 7 Temporary Detention Center, otherwise known as 8 the Audy Home. It was done actually in the 9 probation side, third floor. 10 And we -- about 20 weeks we 11 would have them. There's two components. 12 There's a classroom component and an outreach 13 component. The goal was to reengage those 14 minors, increase their academic aptitude through 15 pre and post testing, engage them and help them 16 with those issues that behaviorally cause 17 disruptions in a normal class setting. 18 They learned how to coexist 19 with other students. Many of the minors were 20 gang involved, so they learned to work with 21 other youth that were also in opposing gangs. 22 And they learned how to do conflict resolution. 23 Because many of these kids, 24 they were taught to hate each other. Some of</p>	<p style="text-align: right;">25</p> <p>1 Q. If you know. 2 A. Four. 3 Q. Do you know the names of them? Just 4 -- 5 A. Randall Strickland, Nicole Wright, 6 Patrick Nelson, and myself. 7 Q. What is their race? 8 I know Mr. Nelson's race. 9 He's African American, right? 10 A. Yes. 11 Q. Okay. What is the race of 12 Mr. Strickland -- 13 A. They were also African American. 14 Q. Both of them? 15 A. Both of them. Yes. 16 Q. Okay. 17 And you held that position of 18 Jumpstart instructor until when? 19 A. Until I was removed in 2015. 20 Q. So I want to, I guess, just ask a 21 couple questions on that -- on this time period, 22 2003 to 2015, while you were a Jumpstart 23 instructor. 24 A. Right.</p>

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<p style="text-align: right;">26</p> <p>1 Q. You said when you started there were 2 four instructors. Did that number change over 3 time? 4 A. Yes, it did. 5 Q. All right. How did it change? 6 A. Nicole Wright married and moved to 7 Arizona. Randall Strickland subsequently found 8 another position outside of the department. 9 Q. Do you know approximately when those 10 things happened? 11 A. I don't recall. 12 Q. All right. 13 Were either of those two 14 individuals replaced? 15 A. Randall was replaced. 16 Q. Do you know by who? 17 A. I believe it was -- I think it was 18 Johanna Almaraz. J-o-h-a-n-n-a, Almaraz, 19 A-l-m-a-r-a-z. Almaraz. I believe that's it. 20 Q. Okay. Was Ms. Wright replaced? 21 A. No. It just -- then it became three 22 instructors. 23 Q. All right. 24 A. Patrick and I took up the bulk of the</p>	<p style="text-align: right;">28</p> <p>1 Q. Just you and Mr. Nelson? 2 A. Correct. 3 Q. And did it change after that? 4 A. I don't know how much time in between, 5 but then there was another officer came, a 6 female. Kisha Roberts. 7 Q. Do you how to spell her first name? 8 A. K-i-s-h-a. 9 Q. Okay. 10 A. And it may have been after a year, I 11 believe, then she came. Maybe a year, year and 12 a half then she came. 13 Q. So maybe for a year to a year and a 14 half, it was just you and Mr. Nelson? 15 A. Correct. 16 Q. And Ms. Roberts' race? 17 A. She's African American. 18 Q. Okay. Anyone else come after that? 19 A. After Ms. Roberts left -- 20 Q. She left, too? 21 A. Yes. 22 Q. Okay. When did she leave? 23 A. Let's see. I believe she left around 24 two thousand and -- it's kind of hazy right now.</p>
<p style="text-align: right;">27</p> <p>1 work. 2 Q. Do you know approximately when that 3 was when you moved down to three? 4 A. I don't recall right now. 5 Q. That's fine. 6 A. Maybe later it might come back to me. 7 Q. That's fine. 8 During this time period, 2003 9 to 2015, did that number ever change from once 10 it went to three? 11 A. When Johanna left it actually went 12 down to two for a while. There was just 13 Mr. Nelson and myself. 14 Q. Okay. Do you know when Johanna left? 15 A. Let's see. It may have been -- and 16 this is rough -- around 2010. 17 Q. All right. 18 And while we are on her, what 19 was her race, Ms. Almaraz? 20 A. She's Hispanic. Hispanic or Latino. 21 Q. That's fine. 22 When Ms. Almaraz left it went 23 down to two; is that right? 24 A. Correct.</p>	<p style="text-align: right;">29</p> <p>1 Q. That's fine. 2 A. I'm thinking two thousand and -- may 3 have been '14 I'm thinking. Put a question mark 4 next to it. 5 Q. Okay. 6 And after Ms. Roberts left, 7 did anyone else come in? 8 A. After about -- I think it was six 9 months maybe -- between six months and a year, 10 then Tatanesha Jackson came. T-a-t-a-n-e-s-h-a 11 or it might be an n-i. 12 Q. Okay. Jackson? 13 A. Jackson. 14 Q. And her race? 15 A. She's African American. 16 Q. All right. Anyone else come in? Up 17 to -- let's go up to 2015. 18 A. And then when Mr. Nelson and myself 19 were -- well, they brought in an officer who had 20 just came out of training. Dale Lomax. 21 Q. When was this? 22 A. This was 2015. 23 Q. All right. 24 A. Right before they removed me and</p>

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<p style="text-align: right;">30</p> <p>1 Nelson.</p> <p>2 Q. Mr. Lomax's race?</p> <p>3 A. African American.</p> <p>4 Q. All right.</p> <p>5 So 2015, was there anyone else</p> <p>6 in the Jumpstart unit? Right now I've got you,</p> <p>7 Mr. Nelson, Ms. Jackson and Mr. Lomax. Does</p> <p>8 that sound right?</p> <p>9 A. And now they have just brought in two</p> <p>10 thousand and -- I believe it was the beginning</p> <p>11 of two thousand -- it was this year sometime.</p> <p>12 They brought in Dan O'Connell.</p> <p>13 Q. Okay. His race?</p> <p>14 A. White. Caucasian.</p> <p>15 Q. I want to focus in -- just to be</p> <p>16 clear, 2015 when you and Mr. Nelson were</p> <p>17 reassigned, was it right that it was the four of</p> <p>18 you? So you, Mr. Nelson, Ms. Jackson, and</p> <p>19 Mr. Lomax? Does that sound right?</p> <p>20 A. It was me, Mr. Nelson and Lo --</p> <p>21 Jackson.</p> <p>22 Q. Okay.</p> <p>23 A. When they removed me and Nelson, then</p> <p>24 they brought in Lomax.</p>	<p style="text-align: right;">32</p> <p>1 Q. Why was there more of those duties?</p> <p>2 A. Every time a new DCPO came in, they</p> <p>3 would add additional duties. Deputy chief</p> <p>4 probation officer.</p> <p>5 Q. Yeah. Yeah. I got it.</p> <p>6 Can you describe what the</p> <p>7 additional duties were?</p> <p>8 A. They were changing the program. They</p> <p>9 shortened the weeks.</p> <p>10 Q. Shortened it from what to what?</p> <p>11 A. They shortened it from -- I believe it</p> <p>12 was twelve to ten, and then it went from ten, I</p> <p>13 believe, to eight. The type of students that we</p> <p>14 received were more gang involved, so there was a</p> <p>15 lot more intense --</p> <p>16 Q. Approximately, when did these changes</p> <p>17 happen?</p> <p>18 A. They started in 2013 with DCPO Donna</p> <p>19 Neal.</p> <p>20 Q. Would she have been your supervisor?</p> <p>21 A. She's the deputy. Supervisor was Tina</p> <p>22 Young.</p> <p>23 Q. Okay. That was kind of my next line</p> <p>24 of questioning. I guess we'll work backwards.</p>
<p style="text-align: right;">31</p> <p>1 Q. Okay. So that was after --</p> <p>2 A. This is all 2015.</p> <p>3 Q. -- your transfer?</p> <p>4 A. Yes. Yes.</p> <p>5 Q. Okay. Got it.</p> <p>6 A. Yes.</p> <p>7 Q. Thanks.</p> <p>8 A. The latter part of 2015.</p> <p>9 Q. So when you and Mr. Nelson were</p> <p>10 removed, the only other person was Tatanesha</p> <p>11 Jackson, is that right, as a Jumpstart</p> <p>12 instructor?</p> <p>13 A. Right. And that was short lived</p> <p>14 because they moved her. They changed the title</p> <p>15 of instructor to something else, but that's how</p> <p>16 it went.</p> <p>17 Q. Let's focus 2015. So when there's</p> <p>18 three of you in there, including Ms. Jackson, so</p> <p>19 I'm talking about --</p> <p>20 Were your job duties the same</p> <p>21 as what you had previously described?</p> <p>22 A. They were. And, of course, there were</p> <p>23 more of those duties. So there was more work to</p> <p>24 be done.</p>	<p style="text-align: right;">33</p> <p>1 When you were removed in 2015,</p> <p>2 who was your direct supervisor?</p> <p>3 A. My direct supervisor was Tina Young.</p> <p>4 Q. All right. And then how far back</p> <p>5 would she have been your direct supervisor?</p> <p>6 A. 2008.</p> <p>7 Q. All right.</p> <p>8 And can you tell me about the</p> <p>9 hierarchy a little bit. So who was Ms. Young's</p> <p>10 supervisor?</p> <p>11 A. The DCPO.</p> <p>12 Q. It would have been Ms. Neal?</p> <p>13 A. Yes.</p> <p>14 Q. All right. Do you know how long she</p> <p>15 was in that position?</p> <p>16 A. Neal was there from, I believe, 2012</p> <p>17 to 2013.</p> <p>18 Q. All right.</p> <p>19 And who was after Ms. Neal?</p> <p>20 Let's get her race while we're on it.</p> <p>21 A. African American.</p> <p>22 Q. Okay. Ms. Young's?</p> <p>23 A. African American.</p> <p>24 Q. All right. So who was after Ms. Neal?</p>

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<p style="text-align: right;">34</p> <p>1 A. After Ms. Neal then came DCPO Melissa 2 Spooner. 3 Q. Her race? 4 A. She's Caucasian. 5 Q. Thank you. 6 All right. And anyone after 7 her? 8 A. After Spooner came DCPO Dennis 9 Alexander, African American. After DCPO 10 Alexander came DCPO Johnson, also African 11 American. 12 Q. First name? 13 A. Dwayne Johnson. 14 Q. Thank you. 15 When you were removed from 16 Jumpstart in 2015, who was -- was Mr. Johnson 17 your supervisor? 18 A. He was -- Tina Young was still my 19 supervisor. 20 Q. Oh, sorry. He was DCPO. 21 A. Dwayne was still the DCPO. 22 Q. Got it. Thanks. 23 And then who does the DCPO 24 report to?</p>	<p style="text-align: right;">36</p> <p>1 the union at the request of then President Avik 2 Das, who's now the interim director of juvenile 3 probation, as we were defending a lot more black 4 officers from charges that did not have merit or 5 substance and it became this pattern, we then 6 started finding ourselves with an X on the back 7 of you. 8 Q. When you say "we," you mean you and 9 Mr. Nelson? 10 A. Yes. 11 Q. Okay. 12 A. It was often disparate treatment as 13 how things related to us and other people. 14 Q. When did Mr. Nelson start in 15 Jumpstart, if you know? 16 A. I started in '93. So I believe Nelson 17 started in '91 or '90. Somewhere around there. 18 '91 or '90 -- 19 Q. You mean 2000, 2001? 20 A. I started in 2003. So he started in 21 2001 or -- 2000 or 2001, somewhere around there. 22 Q. Before you? 23 A. Before me, yes. 24 Q. All right.</p>
<p style="text-align: right;">35</p> <p>1 A. DCPO reports to the director or in 2 this -- in this case the director or the interim 3 director, which is Avik Das. 4 Q. A-v-i-k D-a-s. 5 A. I think he's Pakistani. I don't want 6 to mistake it, but I believe he's Pakistani. 7 Q. Do you know why these changes, like 8 more duties and length from the twelve to eight 9 weeks, why those changes were made, if you know? 10 I guess -- let me rephrase that. That was poor. 11 Was it ever conveyed to you 12 why these changes were made? 13 A. There was an underlining retaliatory 14 effect that started taking place, particularly 15 with me and Nelson. 16 Q. All right. And that would have been 17 beginning 2013? 18 A. '13. 19 Q. Okay. And that was when Ms. Neal was 20 the DCPO? 21 A. Correct. 22 Q. What do you mean when you say 23 "retaliatory?" 24 A. There was -- as we became involved in</p>	<p style="text-align: right;">37</p> <p>1 A. He was actually -- he was actually the 2 one who helped create the program. 3 Q. Okay. Over the time period that you 4 were a Jumpstart instructor, did -- well, I 5 guess, let's backtrack. 6 How would you get, like, the 7 youth into these programs? How did you get the 8 students? Were they ordered by the Court or how 9 did they end up in the Jumpstart program? 10 A. You were right there. The judges 11 would order them. Probation officers would 12 refer them. There's an internal referral form. 13 The public defender could refer them. Even the 14 state's attorney could refer them. And a kid 15 could actually ask his PO, "Can I go?" 16 Q. Did you know this over the -- over 17 this 12-year time period, 2003 to 2015, that the 18 number of students in the Jumpstart program 19 increased or decreased over time? 20 A. It actually had increased. When I 21 first started interning, Jumpstart would have 22 sometimes 40, 45 kids. And it would -- it 23 peaked to the point where we had to open up and 24 get another classroom. And then eventually we</p>

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<p style="text-align: right;">38</p> <p>1 had to have three classrooms so that the program</p> <p>2 rotated just like a -- like a mock school, if</p> <p>3 you would.</p> <p>4 Q. Okay. And then in 2015, how many</p> <p>5 students were there, if you know?</p> <p>6 A. 2015, from what I recall, because</p> <p>7 they -- there's -- there was the opening of some</p> <p>8 alternative schools, I want to say, maybe around</p> <p>9 20 kids, 20.</p> <p>10 Q. When you say opening of alternative</p> <p>11 schools, what do you mean?</p> <p>12 A. Well, the opening of alternative</p> <p>13 schools gave some kids opportunities that didn't</p> <p>14 otherwise exist because crossing gang lines.</p> <p>15 Q. Okay. I guess I'm -- just want more</p> <p>16 clarification of what an alternative school is.</p> <p>17 A. Well, alternative -- the alternative</p> <p>18 -- "charter schools" is the term you may know it</p> <p>19 as. Charter schools started opening.</p> <p>20 Q. Okay.</p> <p>21 A. And some were opening in the kids --</p> <p>22 in their ZIP code. And instead of them having</p> <p>23 to cross sometimes gang lines, which could mean</p> <p>24 life or death, coming to the court was always</p>	<p style="text-align: right;">40</p> <p>1 the charter schools still weren't prepared to</p> <p>2 address.</p> <p>3 And those skill sets that we</p> <p>4 had and the success that we have had over time,</p> <p>5 Patrick and I still have those skill sets and we</p> <p>6 still provided those services, which were now</p> <p>7 known throughout the court including to the</p> <p>8 judges --</p> <p>9 Q. Okay.</p> <p>10 A. -- who would still order the kids to</p> <p>11 start at Jumpstart.</p> <p>12 Q. And how long would they be at</p> <p>13 Jumpstart before you would send them to a</p> <p>14 charter school?</p> <p>15 A. After assessing them remedially, some</p> <p>16 of them needed remedial instruction. Some of</p> <p>17 them had literacy issues. Some could barely</p> <p>18 read. So it did not fair them just because a</p> <p>19 charter school opened in their neighborhood that</p> <p>20 they just go to their charter school and they</p> <p>21 have literacy issues.</p> <p>22 So we -- Nelson and I are</p> <p>23 trained in multi-sensory learning. We also</p> <p>24 address those issues first before transitioning</p>
<p style="text-align: right;">39</p> <p>1 the safest option. It was in a secure facility.</p> <p>2 You would have to go through security. It was</p> <p>3 always a safe option.</p> <p>4 Q. So these charter schools would open</p> <p>5 within neighborhoods?</p> <p>6 A. Right.</p> <p>7 Q. And then they could go there?</p> <p>8 A. Yes.</p> <p>9 Q. All right.</p> <p>10 And who would make the</p> <p>11 determination of whether they would go to either</p> <p>12 a charter school or to you?</p> <p>13 A. They could still come to Jumpstart.</p> <p>14 Q. Okay.</p> <p>15 A. We would still assess them. And if a</p> <p>16 minor required still some things that they --</p> <p>17 that would present difficulties as it would in a</p> <p>18 traditional school, which would be behavioral</p> <p>19 issues, family issues, conduct disorders, then</p> <p>20 we would still have them in Jumpstart first to</p> <p>21 increase the opportunities for them being</p> <p>22 successful, not just to dump them in a charter</p> <p>23 school, per se, because it's in the</p> <p>24 neighborhood. The issues that they have many of</p>	<p style="text-align: right;">41</p> <p>1 that minor to a charter school.</p> <p>2 Q. Would a minor ever be sent right to</p> <p>3 the alternative or charter school?</p> <p>4 A. That has been done. Or yes.</p> <p>5 Q. That's fine.</p> <p>6 We are -- we're going to leave</p> <p>7 Jumpstart. We'll come back. I want to get into</p> <p>8 your specific claims. But now I want to go</p> <p>9 through -- stay on your employment history. So</p> <p>10 2015 you were removed from -- as a Jumpstart</p> <p>11 instructor; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. All right.</p> <p>14 Do you know what your salary</p> <p>15 was at that time?</p> <p>16 A. In the 60s maybe. Somewhere in the</p> <p>17 60s. Close to 70.</p> <p>18 Q. And you were -- we'll get back to</p> <p>19 that.</p> <p>20 So after being a Jumpstart</p> <p>21 instructor, what was your next position?</p> <p>22 A. I was -- you want the information that</p> <p>23 segues into that answer? Or you just want --</p> <p>24 Q. No. Just -- we'll get into it.</p>

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<p style="text-align: right;">42</p> <p>1 But -- so right now just tell me what -- after</p> <p>2 2015 you moved from Jumpstart?</p> <p>3 A. Correct.</p> <p>4 Q. What was your position?</p> <p>5 A. I was then forced into a field</p> <p>6 position where I currently am now.</p> <p>7 Q. Field probation officer?</p> <p>8 A. Field probation officer, yes.</p> <p>9 Q. Did your salary change?</p> <p>10 A. No.</p> <p>11 Actually -- yes, in a way.</p> <p>12 Because they had me working overtime that I</p> <p>13 wasn't being paid. So I don't know if that</p> <p>14 means it changed or it should have went up, but</p> <p>15 it didn't because, again, I was new in this</p> <p>16 position.</p> <p>17 Q. All right. So, again, let's unpack</p> <p>18 that.</p> <p>19 As -- so you're saying as a</p> <p>20 field probation officer, you were working</p> <p>21 overtime?</p> <p>22 A. I was being -- when you are doing</p> <p>23 socials or investigations, you have to work over</p> <p>24 sometimes your time because you don't -- just</p>	<p style="text-align: right;">44</p> <p>1 officer?</p> <p>2 A. 11/15/2015. So it was around that.</p> <p>3 Somewhere around November.</p> <p>4 Q. All right.</p> <p>5 A. They drew our names in hats.</p> <p>6 Q. So then in -- from that until sometime</p> <p>7 in 2016 -- do you know when in 2016 you became</p> <p>8 aware of the overtime issue?</p> <p>9 A. Maybe around -- maybe six months after</p> <p>10 being in the position. Because there was an</p> <p>11 issue that came up with a client whose mom got</p> <p>12 off work later. And I found that the families</p> <p>13 didn't fit the whole stereotype that they are</p> <p>14 all living in public housing, and POs could just</p> <p>15 pop in anytime. They are working families.</p> <p>16 Although they are struggling, they still work,</p> <p>17 and sometimes they got off later.</p> <p>18 Q. All right. So approximately six</p> <p>19 months in the position --</p> <p>20 A. About six months is when --</p> <p>21 Q. -- you realized that you should have</p> <p>22 been paid overtime?</p> <p>23 A. Yes.</p> <p>24 Q. All right.</p>
<p style="text-align: right;">43</p> <p>1 like a police, you don't just stop an</p> <p>2 investigation because it's time to clock out.</p> <p>3 Your supervisor knows about it</p> <p>4 because a judge has ordered the investigation.</p> <p>5 Your deputy knows about it. And so I was new to</p> <p>6 the position and was unbeknown to me that when</p> <p>7 I'm interviewing these families and it's going</p> <p>8 over that I was supposed to be compensated for</p> <p>9 that time.</p> <p>10 Q. All right.</p> <p>11 A. So I guess to your answer is, no, it</p> <p>12 didn't change, but it should have changed.</p> <p>13 Q. So you're saying that you should have</p> <p>14 been paid for overtime that you weren't; is that</p> <p>15 right?</p> <p>16 A. Correct. In that capacity.</p> <p>17 Q. And how long did that happen for?</p> <p>18 A. Almost a year.</p> <p>19 Q. All right. And then that changed?</p> <p>20 A. Yes. I became aware.</p> <p>21 Q. Okay. And so -- so let's say,</p> <p>22 maybe --</p> <p>23 Can you give me the date when</p> <p>24 you were transitioned to a field probation</p>	<p style="text-align: right;">45</p> <p>1 And from that period until</p> <p>2 now, have you been paid overtime?</p> <p>3 A. No. Once I found out then they came</p> <p>4 at a different standard for myself or a</p> <p>5 different set of rules for me. They forced --</p> <p>6 tried to -- well, they, at one point, forced me</p> <p>7 to use anytime that I worked over in some form</p> <p>8 of a flex fashion, where instead of still paying</p> <p>9 me to divert from paying me overtime, they would</p> <p>10 say, well, you have to flex it.</p> <p>11 Q. What does that mean "to flex it?"</p> <p>12 A. Flexing -- exactly. Flexing means</p> <p>13 that if I work overtime -- if I worked five</p> <p>14 hours over on a Friday doing a social with a</p> <p>15 kid, technically that's supposed to be 7.5 hours</p> <p>16 I've earned comp time. They will say, well,</p> <p>17 just take the five hours and you want to get off</p> <p>18 early next Friday or some day or whatever, then</p> <p>19 we'll adjust it. But what they didn't tell me</p> <p>20 was that the interim director --</p> <p>21 Q. Mr. Das?</p> <p>22 A. -- Das put in a separate provision for</p> <p>23 me. Whereas, if I'm busy in court, I didn't</p> <p>24 realize it expired. So he put an expiration</p>

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<p style="text-align: right;">46</p> <p>1 date in there for me. That if I didn't use it 2 within the same week that I got it, it expired. 3 Q. All right. So when did this happen, 4 the expiration date? 5 A. It had been happening in the last -- 6 the last -- probably the last -- I want to say 7 last -- from that time I found out in that six 8 months after, I was kind of monitoring the times 9 specifically. 10 So I would want to say in the 11 last three, four months it's been happening on 12 the regular. But I had to file a grievance 13 because, again, some of my comp time so-called 14 expired or the flex time that they were 15 so-called allowing me to. 16 Q. You said two things. So I just want 17 to be clear. Overtime and comp time. 18 A. Overtime is comp time. 19 Q. Okay. So you -- you weren't -- when 20 you say "overtime," you weren't being paid time 21 and a half, right? 22 A. Right. 23 Q. You would be basically banking extra 24 hours; is that right? That you could then use</p>	<p style="text-align: right;">48</p> <p>1 A. That's right. 2 Q. Okay. Was it everyone else but you? 3 A. I know I wasn't. I know there was a 4 different standard for me, and I know some other 5 people that didn't have that same standard for 6 them. 7 Q. Okay. Who did not have that same 8 standard? 9 A. Jason Smith, for example. 10 Q. He was being paid overtime? 11 A. Yes. 12 Q. And Jason Smith's race? 13 A. African American. 14 Q. Okay. Anyone else you can think of 15 that was being paid overtime? 16 A. When I spoke to some officers -- and 17 I'm trying to recall, it was just some 18 general -- that were in the position before me 19 and some that are supervisors now, they never 20 heard of this flex thing. 21 Q. All right. 22 A. Minnie Blair. 23 Q. Well, I don't -- I'm looking more for 24 people that either -- who had received overtime.</p>
<p style="text-align: right;">47</p> <p>1 to take off. Is that -- am I understanding this 2 right? 3 A. It's supposed to be overtime, but they 4 switched it for me so that I wouldn't get 5 overtime. And instead they made it straight 6 time to be used at a later date, if that makes 7 sense. It's supposed to be -- by law I'm 8 supposed to receive overtime, time and a half, 9 when I worked over my -- my 40 hours. That 10 didn't apply to me because there was a different 11 standard for me. 12 Q. Just for you? 13 A. Just for me. Just based on my race 14 and the disparate treatment. 15 Q. All right. 16 Were -- are you aware of other 17 field probation officers receiving overtime 18 during this time period -- 19 A. Yes. 20 Q. -- 2015 to now? 21 A. Yes. 22 Q. So there were other field probation 23 officers that were receiving paid overtime; is 24 that right?</p>	<p style="text-align: right;">49</p> <p>1 A. Well, Jason Smith is current. 2 Q. Can you think of anyone else -- 3 A. Um -- 4 Q. -- besides -- no, sorry. Let me -- 5 yeah. I'm switching gears. 6 Anyone else besides you who is 7 under this, you know, flex time/comp time 8 program? 9 A. Yeah, my colleague. She's African 10 American. Tonette Jones. 11 Q. Okay. Anyone else? 12 A. The other two in my unit also who are 13 Latino. Solamei -- I'm trying to think of her 14 last name. Juan Arguielles, J-u-a-n 15 A-r-g-u-i-e-l-l-e-s. And I am trying to think 16 of Solamei's last name. I'll think of her -- it 17 will come to me. 18 Q. That's fine. 19 So just to be clear, you came 20 up with two other individuals who -- you came up 21 with three actually. Ms. Jones and then these 22 two other Latinos who are subject to this 23 flex-time policy; is that right? 24 A. Correct.</p>

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<p style="text-align: right;">50</p> <p>1 Q. Okay. And is this flex-time policy</p> <p>2 still in effect for you?</p> <p>3 A. It is not a written policy. It's</p> <p>4 verbal. I have requested an actual paper form,</p> <p>5 and I have not received anything. So it's all</p> <p>6 verbal.</p> <p>7 Q. All right. So as of right now, why</p> <p>8 don't you -- if you can tell me -- what is your</p> <p>9 understanding of the -- however you want to call</p> <p>10 it -- flex time/comp time policy, as it applies</p> <p>11 to you?</p> <p>12 A. As it applies to me. If I -- if my</p> <p>13 supervisor has -- she has notification that I'm</p> <p>14 working over, the time that I worked over is to</p> <p>15 be flexed later, not awarded as time and a half.</p> <p>16 Q. So straight time. So say you worked</p> <p>17 three hours over --</p> <p>18 A. It's all straight time.</p> <p>19 Q. All right.</p> <p>20 You are then -- you then can</p> <p>21 flex those three hours later?</p> <p>22 A. Later.</p> <p>23 Q. All right. And --</p> <p>24 A. But for me there was an expiration on</p>	<p style="text-align: right;">52</p> <p>1 and "flex time." I just want to know what is</p> <p>2 your -- when you say those -- you seem to be</p> <p>3 using those terms differently. What is your</p> <p>4 understanding of how they are different?</p> <p>5 A. Well, overtime is usually the same</p> <p>6 acronym for comp time. Flex time is something</p> <p>7 that actually they create. It's supposed to be</p> <p>8 under a flex schedule, but flex time is</p> <p>9 basically saying that since you have banked this</p> <p>10 time from working over, instead of us giving it</p> <p>11 to you in a standard overtime, time and a half,</p> <p>12 we will give it to you straight time. But you</p> <p>13 can flex it somewhere later in -- when you work.</p> <p>14 Q. Okay. Let's go back. All right. So</p> <p>15 I think I understand flex time now. Now let's</p> <p>16 go to the comp time --</p> <p>17 A. Okay.</p> <p>18 Q. -- which you are also referring to as</p> <p>19 overtime, right?</p> <p>20 A. Right.</p> <p>21 Q. All right. All right. And I just</p> <p>22 want to be clear.</p> <p>23 A. That's fine.</p> <p>24 Q. When you are referring to that -- so</p>
<p style="text-align: right;">51</p> <p>1 that later. Later meant sooner than later.</p> <p>2 Q. And what was the expiration on that?</p> <p>3 A. Within the week of.</p> <p>4 Q. Is that still in place?</p> <p>5 A. It still is in place until I filed a</p> <p>6 grievance because they had expired my time again</p> <p>7 and I had to file a grievance.</p> <p>8 Q. When did you do that?</p> <p>9 A. This was in the last two weeks.</p> <p>10 Q. Okay.</p> <p>11 A. Last two weeks.</p> <p>12 Q. So currently, as you sit here today,</p> <p>13 do you still have to use your flex time within a</p> <p>14 week?</p> <p>15 A. Now they have -- since the grievance I</p> <p>16 told them I don't want any flex. I'd rather</p> <p>17 have my comp time because that doesn't expire.</p> <p>18 Q. Okay.</p> <p>19 A. Because if I'm inundated some days --</p> <p>20 some weeks I have court three days a week. And</p> <p>21 if I take off on a Friday and because it's not</p> <p>22 written down, if I forget, they forget.</p> <p>23 Q. All right.</p> <p>24 You used the terms "comp time"</p>	<p style="text-align: right;">53</p> <p>1 that would be like time and a half, right?</p> <p>2 A. Correct. Correct.</p> <p>3 Q. And that -- are you getting money for</p> <p>4 that?</p> <p>5 A. No. No.</p> <p>6 Q. All right.</p> <p>7 A. It goes in the bank, you know, just</p> <p>8 like the time bank now with the new system where</p> <p>9 you -- there's a software program that we have</p> <p>10 now where we can look at our hours and</p> <p>11 everything that we have banked and there's a</p> <p>12 segment for your comp time. And it's supposed</p> <p>13 to go in there if it's your comp time or your</p> <p>14 overtime that you worked, time and a half.</p> <p>15 Q. Okay.</p> <p>16 A. So it's not in a monetary form, but</p> <p>17 it's in your time.</p> <p>18 Q. All right.</p> <p>19 So, currently, are you</p> <p>20 getting -- now I think we understand the</p> <p>21 difference or I do at least.</p> <p>22 Are you getting flex time or</p> <p>23 comp time for the hours you work over?</p> <p>24 A. They are still pushing this flex time.</p>

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<p style="text-align: right;">54</p> <p>1 So --</p> <p>2 Q. So you're getting straight hours</p> <p>3 for -- say you worked two hours over, you're</p> <p>4 getting the two hours credit?</p> <p>5 A. Yes. Yes. I --</p> <p>6 Q. Is that right? Sorry. Is that right?</p> <p>7 A. Repeat that.</p> <p>8 Q. You get -- say you worked two hours</p> <p>9 over in a week. You are getting two hours</p> <p>10 credit flex time; is that right?</p> <p>11 A. Correct.</p> <p>12 Q. Okay.</p> <p>13 A. If I am to pursue my overtime for</p> <p>14 that, they have given me a separate form I need</p> <p>15 to fill out that my supervisor has to sign, the</p> <p>16 deputy has to sign, and then they send it to the</p> <p>17 director, the interim director, Avik Das. And</p> <p>18 he still reserves the right to -- even after my</p> <p>19 supervisor has approved it, my deputy has</p> <p>20 approved it, but for me he still reserves the</p> <p>21 right to reject it.</p> <p>22 Q. Have you done that, filled out the</p> <p>23 form?</p> <p>24 A. I have it now going forward. I have</p>	<p style="text-align: right;">56</p> <p>1 the families, even though they were low income,</p> <p>2 they were living in low-income housing, and you</p> <p>3 could just go to the house anytime because they</p> <p>4 are there.</p> <p>5 Now you have parents that are</p> <p>6 working. Some are working poor. Some are</p> <p>7 juggling multiple kids, single parent. So it's</p> <p>8 not just a cookie-cutter set time. You work</p> <p>9 around them picking up kids, going to work,</p> <p>10 safety issues. So you try to make yourself</p> <p>11 available for the families.</p> <p>12 And when you -- when I</p> <p>13 noticed, I notified my supervisor and we put</p> <p>14 everything in the JEMS system. So --</p> <p>15 Q. Was does that mean?</p> <p>16 A. JEMS kind of looks like --</p> <p>17 Q. Does that stand for something?</p> <p>18 A. It kind of looks like Commodore 64.</p> <p>19 Q. Oh, I can imagine. What is that?</p> <p>20 What is the lettering?</p> <p>21 A. J-E-M-S.</p> <p>22 Q. J-E-M-S.</p> <p>23 A. And I forgot what the acronyms mean,</p> <p>24 but it's some kind of electronic management</p>
<p style="text-align: right;">55</p> <p>1 copies of the form.</p> <p>2 Q. So you just started doing that; is</p> <p>3 that right?</p> <p>4 A. Yeah. After I filed the grievance.</p> <p>5 Q. All right. Has it been denied yet?</p> <p>6 A. I have yet to utilize it.</p> <p>7 Q. Oh, okay. So you haven't turned in</p> <p>8 the overtime form yet?</p> <p>9 A. Not yet. Not yet.</p> <p>10 Q. Okay. Talking a lot about overtime.</p> <p>11 How many hours -- what are your regular hours</p> <p>12 per week?</p> <p>13 A. 35 to 40 hours, minus the one-hour</p> <p>14 lunch.</p> <p>15 Q. All right.</p> <p>16 And then, approximately, how</p> <p>17 many times -- or how many hours would you say</p> <p>18 you're working over a week?</p> <p>19 A. See, again, when you go to court and</p> <p>20 you get a minor that has a sentencing and dispo,</p> <p>21 at trial the judge can order a social</p> <p>22 investigation, which most times happen. And in</p> <p>23 that is when you are confronted with the reality</p> <p>24 that unlike back in a decade ago where most of</p>	<p style="text-align: right;">57</p> <p>1 system. But if you could just think of</p> <p>2 Commodore 64 with the green screen and the</p> <p>3 light --</p> <p>4 Q. I got you.</p> <p>5 A. -- that's kind of how it looks. It's</p> <p>6 kind of that kind of -- and acronistic</p> <p>7 (phonetic) too.</p> <p>8 But everyone is aware that the</p> <p>9 judge orders a social. Everyone, including your</p> <p>10 supervisor and your deputy, is aware that</p> <p>11 there's a next court date in which this social</p> <p>12 has to be done by because the judge needs to</p> <p>13 look at the social to see what other options</p> <p>14 that may be afforded this minor or in this case</p> <p>15 what kind of probation services.</p> <p>16 There's never an impromptu</p> <p>17 "Oh, I gotta do this right now." There's always</p> <p>18 pre-notice. Now, when you're out in the</p> <p>19 district and you're seeing families, there's</p> <p>20 those things that you can't predict that can</p> <p>21 happen.</p> <p>22 Q. Right.</p> <p>23 A. There may be a shooting. There may be</p> <p>24 some police activity. There may be something</p>

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<p style="text-align: right;">58</p> <p>1 where the family says, "Can we meet somewhere 2 else?" And you will make yourself available to 3 adjust so that you can see these families or, as 4 they say, "meet them where they're at." And 5 when you're doing that, you're making -- you're 6 making the opportunity for you to engage that 7 family as their lives are the ones that are in 8 need of the services.</p> <p>9 And so in those regards you 10 may go over your time. You may go over your 11 regular time. You may even go -- especially if 12 you're engaging the families, there's all kind 13 of things that start to come out when they 14 finally form a rapport with you and you start 15 uncovering all of these dynamics.</p> <p>16 Q. Okay.</p> <p>17 A. Yes.</p> <p>18 Q. I want to ask you, if you can, to put 19 an approximate number of how many hours you work 20 over a week.</p> <p>21 A. Again, it varies.</p> <p>22 Q. Okay. That's fine.</p> <p>23 A. When it comes it comes because it's 24 not -- again, it's not just a cookie-cutter week</p>	<p style="text-align: right;">60</p> <p>1 removing your time from that, so...</p> <p>2 Q. So you're saying you could enter it in 3 and then it could be altered?</p> <p>4 A. Yeah. When you clock in and out, it's 5 registering you what time you clocked in and 6 what time you clocked out, but they have gone 7 back and removed some of my time that I actually 8 worked over and it was justified. My time that 9 I worked over was actually justified time.</p> <p>10 Q. Okay. How many times were they 11 removed?</p> <p>12 A. It's been quite a few. That's why I 13 had to file a grievance because it just got --</p> <p>14 Q. This is the recent grievance?</p> <p>15 A. This is the recent grievance.</p> <p>16 Q. Okay.</p> <p>17 As you sit here are you aware 18 of any other employees where they would alter 19 their overtime hours?</p> <p>20 A. Yeah. My worker who -- PO -- 21 Probation Officer Tonette Jones, she has had 22 some issues where they have altered her time as 23 well.</p> <p>24 Q. Were you ever given a reason as to why</p>
<p style="text-align: right;">59</p> <p>1 by week. You know you're gonna -- got to see 2 your kids every month. If they are high risk, 3 you got to see them at least twice a month. 4 There's certain things that you have to follow 5 up on.</p> <p>6 Q. All right.</p> <p>7 A. Go ahead.</p> <p>8 Q. For the time you have been a field 9 probation officer, have you always kept track of 10 your overtime hours?</p> <p>11 A. Oh, without a doubt. Yes.</p> <p>12 Q. And that's in the JEMS system; is that 13 right? Is that how do you it? Or how do you 14 keep track of them?</p> <p>15 A. No. You keep track -- since they've 16 gotten rid of the actual paper where you used to 17 sign in on a paper sheet, I still keep a journal 18 log just like this one. (Indicating.)</p> <p>19 Q. By "this" you mean like a notepad?</p> <p>20 A. Notepad. I still keep a copy of a 21 notepad.</p> <p>22 And then there is a system 23 that it's supposed to go into, the new 24 computerized system, but they have a way of</p>	<p style="text-align: right;">61</p> <p>1 your time is altered?</p> <p>2 A. Because --</p> <p>3 Q. Not what you think why, but have you 4 ever been given a reason why?</p> <p>5 A. Well, no one is going to say because 6 you're black and they are discriminating against 7 you, they're retaliating, and, you know, 8 basically you're just going to have it hard from 9 here on out. They're not going to say that.</p> <p>10 And they try to use subtle 11 things like, you know, it's per the interim 12 director, but there's no real substance -- no 13 reasonable substance.</p> <p>14 Q. Okay. Can you think of any specific 15 reason they have given you, even if it's without 16 substance?</p> <p>17 A. Any reason that they have given me?</p> <p>18 Q. Yeah.</p> <p>19 A. They haven't given me any reason. I 20 have asked for everything in writing, and I have 21 yet to receive anything that would give reason.</p> <p>22 Q. All right.</p> <p>23 And I want to go back and 24 clarify one thing while we're still on the</p>

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<p style="text-align: right;">62</p> <p>1 overtime issue.</p> <p>2 A. Sure.</p> <p>3 Q. When you said Jason Smith would get</p> <p>4 it -- and I think we may be talking about being</p> <p>5 paid. I just want to be clear.</p> <p>6 When you said Jason Smith got</p> <p>7 overtime, he was getting the bank of the days;</p> <p>8 is that right?</p> <p>9 A. Correct. Correct.</p> <p>10 Q. And is it time and a half? It's,</p> <p>11 like, 1.5 hours for every hour?</p> <p>12 A. Yeah. Yeah.</p> <p>13 Q. Is that in a policy or CBA or anything</p> <p>14 anywhere, the overtime policy?</p> <p>15 A. That's federal. That's labor law.</p> <p>16 The only --</p> <p>17 Q. We don't need to get into labor law.</p> <p>18 I just want to know if it's in -- sometimes</p> <p>19 these things will be in, like, the Collective</p> <p>20 Bargaining Agreement. You know what I mean when</p> <p>21 I refer to the CBA, right?</p> <p>22 A. Right.</p> <p>23 Q. Do you know if it's in there?</p> <p>24 A. With the CBA it's basically -- all you</p>	<p style="text-align: right;">64</p> <p>1 BY MR. HAYES:</p> <p>2 Q. And he's with adult, right?</p> <p>3 A. Adult, yes.</p> <p>4 Q. It's fair to say they are different</p> <p>5 departments from juvenile?</p> <p>6 A. The only thing they get to carry</p> <p>7 weapons.</p> <p>8 Q. All right. But they are -- would you</p> <p>9 say they are different departments of --</p> <p>10 A. We're dealing -- since they raised the</p> <p>11 age, we're dealing with 18, 19 and 20-year-olds</p> <p>12 also.</p> <p>13 Q. Okay. I'm just trying to make a clear</p> <p>14 record here.</p> <p>15 The Adult Probation</p> <p>16 Department, would you say it's different from</p> <p>17 the Juvenile Probation Department?</p> <p>18 A. It's different. Yeah. It's</p> <p>19 different.</p> <p>20 Q. Different director, right?</p> <p>21 A. Different director, too. Yes.</p> <p>22 Q. Okay. All right.</p> <p>23 A. Yes.</p> <p>24 Q. Has Ms. Kentzler ever denied your</p>
<p style="text-align: right;">63</p> <p>1 need is pre-approval from your supervisor. And,</p> <p>2 basically, as long as the work that you're doing</p> <p>3 is justified on behalf of the minor, the client,</p> <p>4 and the department, that's pretty much where the</p> <p>5 CBA is on it. Everything else has been created</p> <p>6 artificially.</p> <p>7 Q. Who's your current supervisor?</p> <p>8 A. Eileen Kentzler.</p> <p>9 Q. Spell the last name.</p> <p>10 A. K-e-n-t-z-l-e-r.</p> <p>11 Q. Race?</p> <p>12 A. She's white. Caucasian.</p> <p>13 The only person I know that</p> <p>14 actually have -- that I know of that has</p> <p>15 actually received financial compensation from</p> <p>16 comp time is probably Phillip Loizon, and he's</p> <p>17 known as the "Comp Time King."</p> <p>18 Q. Okay.</p> <p>19 THE REPORTER: Spell his name, please,</p> <p>20 last name.</p> <p>21 THE WITNESS: Loizon, L-o-i-z-o-n.</p> <p>22 And he is with adult probation. And I think he</p> <p>23 amassed over 3,750 hours to the sum of over</p> <p>24 \$200,000.</p>	<p style="text-align: right;">65</p> <p>1 extra time, overtime request?</p> <p>2 A. She's -- she's referred what she has</p> <p>3 been told by Interim Director Das, and that kind</p> <p>4 of removed her from it. But she's -- all she's</p> <p>5 done is recited what she's been told in the</p> <p>6 management meetings to do. So, again, she was</p> <p>7 just following her orders as it related to me.</p> <p>8 Q. So she's never directly told you, "I'm</p> <p>9 denying this because I want to deny it?"</p> <p>10 A. No.</p> <p>11 Q. How long has she been your direct</p> <p>12 supervisor?</p> <p>13 A. She came in -- let's see. Ron Dustman</p> <p>14 left in, I want to say, in October/November of</p> <p>15 2016. So she's come in right around the</p> <p>16 transition of November to December 2016 'til</p> <p>17 now.</p> <p>18 Q. Okay. Who is your DCPO right now?</p> <p>19 A. Karen Kelly.</p> <p>20 Q. What's her race?</p> <p>21 A. African American.</p> <p>22 Q. What's Ms. Kelly's role in approving</p> <p>23 this overtime?</p> <p>24 A. Once the supervisor and I have our</p>

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<p style="text-align: right;">66</p> <p>1 conversations, then since I have to fill out 2 this form now, she signs off on the form and it 3 states the reason for the request for working 4 overtime. And then she signs off and then she 5 sends it to the interim director, who's then 6 supposed to give it the nod yes or no. 7 Q. Okay. 8 A. But up until I filed a grievance, she 9 was relaying the sentiments of the interim 10 director that I was supposedly to be given not 11 comp, not overtime, but I was to be given 12 straight hours -- straight time. So she echoed 13 whatever she was told by the interim director. 14 Q. And did she give you a reason why this 15 was happening? 16 A. She's the one that I requested the 17 document from to show me this policy as to how 18 and why this relates to me and me only. Because 19 I know for a fact this did not apply to all 20 officers. 21 Q. And did she give you a reason? 22 A. I have never gotten anything in 23 writing. 24 Q. But did she tell you anything?</p>	<p style="text-align: right;">68</p> <p>1 to be continued because the department was 2 unwilling to allow me to meet with this family 3 after my work hours, which is when the mom had 4 time to pick up -- get off work, pick up her 5 kids, and then she got them fed and settled in. 6 She was willing to do the interview, but it was 7 after. 8 Q. So other than Ms. Kelly saying, "the 9 interim director told me to do it this way," she 10 never gave you any other reason; is that right? 11 A. You know, there's been some sidebars 12 where she's like, you know, "Theo, you know what 13 you're up against," and no other details went 14 into that. So that's just inferred. 15 So I take that to mean that 16 I'm going to be receiving disparate treatment. 17 I'm going to be -- 18 Q. All right. 19 I mean, did she -- I mean, did 20 she give you any other reason? 21 A. No. Nothing -- nothing that would 22 make sense. 23 Q. Well, you say "nothing that would make 24 sense." But I'm looking just for if she's</p>
<p style="text-align: right;">67</p> <p>1 A. That it's just what the interim 2 director has instructed and that that -- 3 Q. Did she tell you why the interim 4 director instructed this? 5 A. They're never going to tell me that, 6 you're -- Theo, you're black, you're gonna be -- 7 you got the X on your back. 8 Q. Right. But did she give you any other 9 reason? 10 A. That the interim director has directed 11 them that I am to give straight time and to flex 12 it later, and that if I want to get comp time, 13 there's this form I need to fill out. I need to 14 state the reason for the -- working overtime. 15 Supervisor signs off. She signs off. He gets 16 it and he still reserves the right to reject it. 17 Doesn't say how long it's going to take him to 18 decide, when or whatever. 19 But all I know is that the 20 judge orders the social and I've exhausted all 21 efforts to try to meet with the family within my 22 time, within my normal work hours. Then what 23 happens is, what recently happened, a case had 24 to be continued. So a sentencing and dispo had</p>	<p style="text-align: right;">69</p> <p>1 telling you "so this policy is being applied to 2 you in a particular way." 3 A. Right. 4 Q. Is she telling you -- other than what 5 you've already told me, is there anything else 6 that she's telling you, "Theo, this is why it's 7 being applied?" 8 A. No. 9 Q. Okay. Okay. Let's switch gears a 10 little bit. 11 Okay. Talking about the Chief 12 Judge. Are you familiar with the Defendant, the 13 Chief Judge of Cook County? 14 A. Yes. 15 Q. And who is that? 16 A. Timothy Evans. 17 Q. Do you consider Judge Evans your 18 employer? 19 A. Yes. 20 Q. All right. 21 Why do you consider him your 22 employer? 23 A. He's in our contract as the employer. 24 Q. By "contract" you mean, like, the</p>

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<p style="text-align: right;">70</p> <p>1 Collective Bargaining Agreement?</p> <p>2 A. CBA, yes. He signs off on everything.</p> <p>3 Q. We'll get into that.</p> <p>4 All right. Let's see when he</p> <p>5 says -- when you say "he signs off on</p> <p>6 everything," what do you mean that?</p> <p>7 A. Any official documents that come</p> <p>8 through the department his signature is on</p> <p>9 there.</p> <p>10 Q. Give me an example. I'm not sure I --</p> <p>11 A. When I was hired. When I was hired,</p> <p>12 his signature --</p> <p>13 Q. On your offer letter?</p> <p>14 A. Yes.</p> <p>15 Q. His signature?</p> <p>16 A. From what I recall, his signature.</p> <p>17 He's on every piece of letterhead.</p> <p>18 Q. Not signature on the letterhead,</p> <p>19 right?</p> <p>20 A. Well, not signature. But --</p> <p>21 Q. Right.</p> <p>22 A. -- for the most part, important</p> <p>23 documents that I've seen, any memos, official</p> <p>24 memos, his signature is on there. Anything</p>	<p style="text-align: right;">72</p> <p>1 A. No, no, no.</p> <p>2 After the termination has been</p> <p>3 accepted by him because the director has to send</p> <p>4 the request to him --</p> <p>5 Q. For termination?</p> <p>6 A. For termination.</p> <p>7 Q. All right. So I guess that's what I</p> <p>8 was getting at.</p> <p>9 So you take -- Judge Evans'</p> <p>10 signature would be on termination letters?</p> <p>11 A. The director would request Judge</p> <p>12 Evans' consent for this worker to be terminated,</p> <p>13 and from what I recall, that gave it the green</p> <p>14 light.</p> <p>15 Q. All right.</p> <p>16 A. Because he's the employer.</p> <p>17 Q. If you know, would he -- his consent,</p> <p>18 as you said, would it then be him signing</p> <p>19 letters? Or when you say "consent by Judge</p> <p>20 Evans," what do you mean by that?</p> <p>21 A. Well, if he's the employer, he's in</p> <p>22 charge.</p> <p>23 Q. I'm looking for specific examples.</p> <p>24 A. Okay. And I have to go back.</p>
<p style="text-align: right;">71</p> <p>1 changes in the department, department wide, I</p> <p>2 mean, throughout the whole court system, his</p> <p>3 signature is on there.</p> <p>4 Q. So I just want to be clear. When you</p> <p>5 say "department wide," you don't mean just the</p> <p>6 Juvenile Probation Department. You mean the</p> <p>7 entire court system?</p> <p>8 A. Yeah. The court system that he</p> <p>9 oversees.</p> <p>10 Q. When you're getting just JPD memos,</p> <p>11 would his signature be on those?</p> <p>12 A. Just for juvenile probation stuff?</p> <p>13 Q. Correct.</p> <p>14 A. In different capacities.</p> <p>15 Q. What do you mean?</p> <p>16 A. When I was a union steward for</p> <p>17 discipline and things like terminations and</p> <p>18 things like that, his signature would be on</p> <p>19 them.</p> <p>20 Q. Okay. Let's get into that a little</p> <p>21 bit.</p> <p>22 A. Okay.</p> <p>23 Q. So you're saying his signature is on,</p> <p>24 like, discipline letters?</p>	<p style="text-align: right;">73</p> <p>1 But there was -- there was an</p> <p>2 African-American female that the director -- the</p> <p>3 former Director Rohan, he was really going after</p> <p>4 her. And I believe after multiple requests and</p> <p>5 after, I believe, a Freedom of Information Act</p> <p>6 request, those correspondence between Rohan and</p> <p>7 Chief Judge, I believe they were finally</p> <p>8 received by the former union president, Jason</p> <p>9 Smith. And in it it showed Mike Rohan</p> <p>10 specifically requesting the Chief Judge.</p> <p>11 Q. And how do you know that?</p> <p>12 A. There is documentation.</p> <p>13 Q. You've seen it or were you told?</p> <p>14 A. I was told.</p> <p>15 Q. By Mr. Smith?</p> <p>16 A. Yes.</p> <p>17 Q. So you haven't seen it; is that right?</p> <p>18 A. I haven't seen that specific --</p> <p>19 Q. That specific letter?</p> <p>20 A. Yes. Yes.</p> <p>21 Q. Okay.</p> <p>22 So let me just get kind of --</p> <p>23 I just want your understanding of the Chief</p> <p>24 Judge's role in discipline of Juvenile Probation</p>

19 (Pages 70 to 73)

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<p style="text-align: right;">74</p> <p>1 Department employees.</p> <p>2 A. Chief Judge has people that he's</p> <p>3 appointed to oversee different departments that</p> <p>4 he's omnipotent. So when there is -- other than</p> <p>5 policy changes like when the computer policy</p> <p>6 changed where people -- he was making it known</p> <p>7 that people could not do certain things.</p> <p>8 I think there was -- something</p> <p>9 happened somewhere downtown where someone was</p> <p>10 doing pornography on the computer. So he sent</p> <p>11 out a notice to all of the partners and his</p> <p>12 signature was at the bottom. I do remember</p> <p>13 that.</p> <p>14 Q. All right.</p> <p>15 A. So he does appoint people in the</p> <p>16 different departments that he oversees.</p> <p>17 Q. But I just want to know what is your</p> <p>18 understanding -- and if you don't know, that's</p> <p>19 fine. But what is your understanding of his</p> <p>20 specific role in discipline of JPD employees?</p> <p>21 A. From my understanding he has the last</p> <p>22 say so.</p> <p>23 Q. All right. So your understanding is</p> <p>24 that he is either agreeing or disagreeing with</p>	<p style="text-align: right;">76</p> <p>1 k or it's just S-e-v-i-k, I believe.</p> <p>2 Q. I think it's c-k.</p> <p>3 A. And that's his designee that oversees</p> <p>4 those grievance matters.</p> <p>5 Q. All right.</p> <p>6 A. But from what I understand, when it</p> <p>7 applies to suspensions and terminations -- or</p> <p>8 especially terminations, from my understanding,</p> <p>9 those --</p> <p>10 Q. Do you have any firsthand knowledge of</p> <p>11 dealing with Chief Judge Evans in termination or</p> <p>12 suspension matters?</p> <p>13 A. I have assisted -- as a steward I've</p> <p>14 assisted Mr. Smith in some proceedings where</p> <p>15 some suspensions were brought forth.</p> <p>16 Q. And in those suspension proceedings,</p> <p>17 what was your observation of Chief Judge Evans'</p> <p>18 role?</p> <p>19 A. That he had the last say so.</p> <p>20 Q. All right.</p> <p>21 A. Whether he consented or not consented.</p> <p>22 Q. All right.</p> <p>23 I'm going to ask this. Did</p> <p>24 you ever hear him say, "I have the last say so</p>
<p style="text-align: right;">75</p> <p>1 the discipline? Does that sound right? I --</p> <p>2 I -- strike that.</p> <p>3 What do you mean -- let's do</p> <p>4 it a better way. What do you mean by "he has</p> <p>5 the last say so?"</p> <p>6 A. From my understanding he is the</p> <p>7 deciding factor if this person is to be -- as</p> <p>8 relates to discipline, if it's to be implemented</p> <p>9 or not. That's from my understanding.</p> <p>10 Q. And is it your understanding that he</p> <p>11 would have that -- the last say so in all forms</p> <p>12 of discipline?</p> <p>13 A. That's my understanding being that</p> <p>14 he's the Chief Judge.</p> <p>15 Q. All right. So from, like, a reprimand</p> <p>16 all the way up to termination; is that right?</p> <p>17 A. From my understanding of terminations,</p> <p>18 suspensions, from my understanding, those things</p> <p>19 require his say so. From my understanding</p> <p>20 reprimands, they can go -- a grievance process</p> <p>21 can be taken to his office where he has an</p> <p>22 appointee. Keith Sevic.</p> <p>23 Q. Can you spell Keith's last name.</p> <p>24 A. S-e-v-i -- I think it's a k -- c and</p>	<p style="text-align: right;">77</p> <p>1 in discipline matters?"</p> <p>2 A. No. I -- not that I recall ever</p> <p>3 hearing him saying that.</p> <p>4 Q. When you were involved in the union --</p> <p>5 we'll get into that in a little bit. But just</p> <p>6 for the purpose of this line of questioning,</p> <p>7 when you were involved in the union -- and I</p> <p>8 want to talk about the specific instance you</p> <p>9 just referenced and the suspensions that you</p> <p>10 were involved in.</p> <p>11 Did you ever see Judge Evans,</p> <p>12 like, anywhere, like, at any of the meetings or</p> <p>13 the hearings or anything like that for any of</p> <p>14 these suspensions?</p> <p>15 A. No. It would always be his designee,</p> <p>16 Keith Sevic.</p> <p>17 Q. Do you know Mr. Sevic's official</p> <p>18 title?</p> <p>19 A. From my understanding it's the Chief</p> <p>20 Judge's legal designee.</p> <p>21 Q. All right.</p> <p>22 To your knowledge, did Chief</p> <p>23 Judge make any decisions regarding your</p> <p>24 employment in anything at all? Regarding your</p>

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<p style="text-align: right;">78</p> <p>1 employment with JPT -- JPD did -- are you aware 2 of Judge Evans having any specific role? 3 A. When you fill out the application 4 there's, I think, three places you have to send 5 it. You have to send it to Springfield. You 6 have to send a copy to his office, and I 7 believe, you know, which counties that you would 8 desire to work in. And one of the forms has to 9 go to his office. 10 Q. All right. 11 A. And, I believe, probation is where we 12 actually filled out the application, but 13 there's -- his office was definitely sent your 14 information, the package, as was Springfield. 15 So to my knowledge that signifies that, you 16 know, as -- 17 Q. Did you ever meet with Chief Judge 18 Evans when you were applying? 19 A. No. 20 Q. All right. 21 Outside of this application, 22 anything else that you can think of that -- 23 where Judge Evans was involved directly in any 24 employment decision about you?</p>	<p style="text-align: right;">80</p> <p>1 A. Right. 2 Q. Okay. And I'll just go through them 3 and ask you a few questions. 4 Are you familiar with Anthony 5 Jordan? 6 A. Yes. 7 Q. And who is he? 8 A. He's one of the Plaintiffs. 9 Q. And how do you know Mr. Jordan? 10 A. I have known Mr. Jordan -- I have 11 worked with him at JPD. 12 Q. Since 2003? 13 A. Yes. 14 Q. Mr. Jordan wasn't in Jumpstart though, 15 right? 16 A. No. 17 Q. All right. He was a field probation 18 officer, if you know? 19 A. From my understanding, yes. 20 Q. All right. 21 So -- and you would have had 22 different supervisors; is that right? I guess, 23 let's say immediate supervisors; is that right? 24 A. Uh --</p>
<p style="text-align: right;">79</p> <p>1 A. No. 2 Q. Okay. 3 To your knowledge, if you 4 know, was Chief Judge involved in the decision 5 to transfer you out of Jumpstart? 6 A. To my knowledge, he had to consent -- 7 from my understanding, his consent -- 8 Q. Okay. 9 A. -- because a grievance was filed, it 10 went all the way up to the Step 4, Keith Sevic 11 -- 12 Q. Which would have been his office, 13 right? The Chief Judge's office? 14 A. To his office. 15 Q. So just to be clear, your 16 understanding of his consent was that a Step 4 17 grievance was sent to the Chief Judge's office; 18 is that right? 19 A. Correct. 20 Q. Okay. Now I want to switch gears 21 again just a little bit. I want to talk about 22 the other Plaintiffs in this lawsuit. 23 Are you aware that there are 24 other Plaintiffs, not just you, right?</p>	<p style="text-align: right;">81</p> <p>1 Q. Than Mr. Jordan? 2 A. Yes. 3 Q. All right. Probably up until the 4 director; is that right? 5 A. Yes. 6 Q. Let's go just while Mr. Jordan was 7 employed at JPD. What -- were you friends with 8 him? 9 A. No. I had a social -- I mean, you 10 know, you know -- when you work there, just like 11 people become familiar, you know, he had a, you 12 know -- he had referred some kids to Jumpstart 13 in the past. I guess as a field officer he had 14 referred some kids. So we -- you develop a 15 rapport with people in that manner. 16 Q. Did you hang out -- hang out with 17 Mr. Jordan outside of work? 18 A. No. He doesn't -- he doesn't golf. 19 He doesn't do what I do. 20 MR. HAYES: All right. 21 (WHEREUPON, Chapman Deposition 22 Exhibit No. 1 was marked for 23 identification.) 24</p>

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<p style="text-align: right;">82</p> <p>1 BY MR. HAYES:</p> <p>2 Q. All right. So, Mr. Chapman, the court</p> <p>3 reporter has just handed you what she's marked</p> <p>4 as Exhibit 1, and we didn't really go over how</p> <p>5 these work.</p> <p>6 I'm going to go through</p> <p>7 several, probably, documents today. And she'll</p> <p>8 mark them, hand them to you, and then I will ask</p> <p>9 you a few questions on them. So that's, you</p> <p>10 know, your copy during the deposition, but it</p> <p>11 will be handed back to the court reporter at the</p> <p>12 end.</p> <p>13 A. Okay.</p> <p>14 Q. All right. So just take a look at</p> <p>15 that. I will ask you -- actually, this is --</p> <p>16 well, tell me what --</p> <p>17 Do you recognize what this is?</p> <p>18 A. Yes.</p> <p>19 Q. All right. What is this?</p> <p>20 A. Second Amended Complaint.</p> <p>21 Q. All right.</p> <p>22 So is this your complaint in</p> <p>23 this lawsuit, correct?</p> <p>24 A. It looks to be intact, yes.</p>	<p style="text-align: right;">84</p> <p>1 Q. That Mr. Jordan is making.</p> <p>2 A. Okay.</p> <p>3 Q. Go ahead. You want to look through</p> <p>4 it?</p> <p>5 A. Yeah.</p> <p>6 Q. Go ahead and look through it.</p> <p>7 A. Okay.</p> <p>8 Q. All right.</p> <p>9 Are there anything -- any</p> <p>10 of -- any of his allegations in there that you</p> <p>11 were specifically involved in?</p> <p>12 A. Discrimination.</p> <p>13 Q. All right. What are you referring to?</p> <p>14 Which number? Sorry.</p> <p>15 A. 56.</p> <p>16 Q. Paragraph number?</p> <p>17 A. 56.</p> <p>18 Q. All right. How are you involved in</p> <p>19 that?</p> <p>20 A. Involved directly or as a steward?</p> <p>21 Q. Okay. As a steward. Yeah.</p> <p>22 A. As a steward there were some other</p> <p>23 white officers in this unit that had far worse</p> <p>24 circumstances than this, and they received --</p>
<p style="text-align: right;">83</p> <p>1 Q. Okay. So I'll be using this exhibit</p> <p>2 throughout the deposition today. So --</p> <p>3 A. Okay.</p> <p>4 Q. -- just so you know.</p> <p>5 But right now I want to ask</p> <p>6 you a couple questions about Mr. Jordan that are</p> <p>7 in here. I want to focus on Paragraphs 48 to</p> <p>8 57.</p> <p>9 A. What page?</p> <p>10 Q. That's going to be 16 to 17.</p> <p>11 A. All right.</p> <p>12 Q. So you see the heading there says</p> <p>13 "Anthony Jordan," right?</p> <p>14 A. Correct.</p> <p>15 Q. So I want to do this for each one --</p> <p>16 each one of the Plaintiffs. But I just want you</p> <p>17 to read that, his allegations, and then I'm just</p> <p>18 going to --</p> <p>19 All I'm going to ask you --</p> <p>20 and I'll tell you right now -- I want you to</p> <p>21 read it thinking that I'm going to ask you if</p> <p>22 you have any specific firsthand knowledge of any</p> <p>23 of the allegations.</p> <p>24 A. Against Mr. Jordan?</p>	<p style="text-align: right;">85</p> <p>1 they received not even a write-up. And --</p> <p>2 Q. Were you involved -- strike that.</p> <p>3 Were you a union steward when</p> <p>4 Mr. Jordan was discharged?</p> <p>5 A. Yes.</p> <p>6 Q. All right. Did you handle his</p> <p>7 discharge?</p> <p>8 A. I assisted Mr. Smith in the case.</p> <p>9 Q. And what do you mean by "assisted?"</p> <p>10 A. Mr. Smith was the union president. So</p> <p>11 he was the -- he was the first and I was the</p> <p>12 second. You know, the --</p> <p>13 Q. So what did you do on that?</p> <p>14 Let's just focus on Mr. Jordan's discharge.</p> <p>15 A. Sure.</p> <p>16 Q. What was your role in that grievance -- I</p> <p>17 assume that was a grievance.</p> <p>18 A. That was a grievance.</p> <p>19 Q. So what was your role in that</p> <p>20 grievance?</p> <p>21 A. Looking at the evidence; looking at</p> <p>22 the charge; looking at if there were some</p> <p>23 standards; looking at other similar instances;</p> <p>24 whereby a kid had done something in the public</p>

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<p style="text-align: right;">86</p> <p>1 and it made the news; how the department reacted</p> <p>2 when it was a white person as opposed to when it</p> <p>3 was a black person or African American.</p> <p>4 Just seeing if there was</p> <p>5 disparities or disparate treatment or some form</p> <p>6 of bias or racial bias. Because this wasn't</p> <p>7 uncommon for youth in this EM Department to --</p> <p>8 Q. Well, why don't you describe what the</p> <p>9 EM Department is?</p> <p>10 A. Electronic Monitoring. It wasn't --</p> <p>11 what they -- initially what we found out is it</p> <p>12 was misleading to the public because it did not</p> <p>13 work like ADT. ADT means if your home gets</p> <p>14 broken into right now, you would get an alert on</p> <p>15 your phone, something is going to go off or if</p> <p>16 you've got cameras in there, you're gonna be</p> <p>17 well aware in, like, less than -- in less than</p> <p>18 five minutes you're going to be fully aware.</p> <p>19 It didn't work like that. EM</p> <p>20 only tracked dots. So when you got off of your</p> <p>21 shift, your eight-hour shift, your kid can go</p> <p>22 out doing some things like The Purge. You</p> <p>23 wouldn't know about it until the next day when</p> <p>24 you got to work and you pulled up the computer</p>	<p style="text-align: right;">88</p> <p>1 restorative services. They sent Aaron Parks</p> <p>2 twice back into the same community, only for him</p> <p>3 to escalate.</p> <p>4 Anthony Jordan was a new</p> <p>5 officer in this unit. Why they gave him such a</p> <p>6 high-profile client. I found out later because</p> <p>7 I, too, was placed in the same position, which I</p> <p>8 called the "Anthony Jordan Rule."</p> <p>9 Q. What -- sorry. Strike that.</p> <p>10 Who were the other -- and I</p> <p>11 believe you referenced this. Who are the other</p> <p>12 officers in the EM unit who weren't discharged</p> <p>13 besides --</p> <p>14 A. Um --</p> <p>15 Q. Let me just get the question out.</p> <p>16 A. Go ahead.</p> <p>17 Q. -- who weren't discharged for the same</p> <p>18 conduct?</p> <p>19 And by that I mean -- I might</p> <p>20 be using the terms wrong, but I don't know</p> <p>21 what -- the minor that -- what -- for like --</p> <p>22 the minor who is being monitored.</p> <p>23 A. Right.</p> <p>24 Q. Can you give me any other individuals</p>
<p style="text-align: right;">87</p> <p>1 and you see all these dots all over the place.</p> <p>2 And even then you might have</p> <p>3 the department that says, well, just contact</p> <p>4 them, but don't violate them yet because we want</p> <p>5 to keep the numbers down low out of the</p> <p>6 detention center under the Detention Reduction</p> <p>7 Project.</p> <p>8 So here you have this kid --</p> <p>9 which in this case I'm fully aware of. Aaron</p> <p>10 Parks had two violent previous felonies before</p> <p>11 he escalated to the case of the kidnapping and</p> <p>12 aggravated rape. In both of those cases, he</p> <p>13 should have been held, but Judge Berman released</p> <p>14 him back on EM per the orders of the Chief</p> <p>15 Judge, as well as the board president under the</p> <p>16 Detention Reduction Project.</p> <p>17 He received no services unlike</p> <p>18 if you had a -- if you're aware, you know, I</p> <p>19 have an animal. I have a dog. And whenever you</p> <p>20 look at rescue animals, especially pit bulls,</p> <p>21 they're not just sent back to the owner who had</p> <p>22 them in the backyard fighting and killing</p> <p>23 another dog. They're actually given some</p> <p>24 services. They're restored. They're given some</p>	<p style="text-align: right;">89</p> <p>1 who were not discharged, who were working the EM</p> <p>2 unit whose minor went off and committed a crime</p> <p>3 similar to what this individual did with</p> <p>4 Mr. Jordan?</p> <p>5 A. I don't have the information right</p> <p>6 here in front of me. But I do recall when</p> <p>7 Mr. Smith and I were doing our investigation to</p> <p>8 try to -- throughout the grievance process, we</p> <p>9 were uncovering some very bigoted, if you will,</p> <p>10 facts that showed that there was disparate</p> <p>11 treatment in how Mr. Jordan was being treated.</p> <p>12 Q. Can you think of any specific</p> <p>13 individuals, as you sit here today?</p> <p>14 A. There was a recent case where a white</p> <p>15 female, Tina -- I believe it's Tina Grunauer</p> <p>16 (phonetic). She had the task of actually</p> <p>17 monitoring the computer system that now, since</p> <p>18 it's been updated, tracks the movement. And on</p> <p>19 many occasions she vacated her duties by failing</p> <p>20 to be present.</p> <p>21 Q. And how do you know about that?</p> <p>22 A. Well, eventually the department had</p> <p>23 filed a disciplinary action against her.</p> <p>24 And in that discovery that</p>

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<p style="text-align: right;">90</p> <p>1 they presented, they showed evidence that not</p> <p>2 only was she not at her station at which time</p> <p>3 her other colleagues, who were also Latino and,</p> <p>4 I believe, African American, she had similar</p> <p>5 hits -- hits are when a minor goes outside of</p> <p>6 his parameters -- and she was not responding to</p> <p>7 those and they became numerous. And when her</p> <p>8 supervisor brought this to her attention, she</p> <p>9 could not -- she could not account for that.</p> <p>10 And when it became known to</p> <p>11 the department and they moved towards</p> <p>12 discipline, not only was she allowed to remain</p> <p>13 at work while they were doing their interview,</p> <p>14 which is different for African-American</p> <p>15 officers, we found that they almost always</p> <p>16 suspend an officer who's African American while</p> <p>17 they are doing their investigation.</p> <p>18 Q. Did -- I can't remember her last name.</p> <p>19 But did -- did any of the individuals that Tina</p> <p>20 failed to monitor commit the same crime that --</p> <p>21 that Parks did?</p> <p>22 A. From my understanding, there was some</p> <p>23 individuals in that she was to monitor did --</p> <p>24 even some instances even worse; whereby they</p>	<p style="text-align: right;">92</p> <p>1 held?</p> <p>2 A. Treasurer.</p> <p>3 Q. When were you treasurer?</p> <p>4 A. 2016, 2014, 2015. Half -- I finished</p> <p>5 out half of '14 and I believe the whole of '15.</p> <p>6 Q. All right.</p> <p>7 A. It's usually two years.</p> <p>8 Q. And, again, what union is this?</p> <p>9 A. Local -- AFSCME Local 3477.</p> <p>10 Q. Okay. Anything other than treasurer?</p> <p>11 A. No. Just union steward. Oh, and I</p> <p>12 was a people's chair.</p> <p>13 Q. All right. What's -- what's a</p> <p>14 people's chair?</p> <p>15 A. People's chair is the -- the political</p> <p>16 arm whereby, you know, we -- we vet different</p> <p>17 candidates that are trying to run for office</p> <p>18 that are looking for union support or union</p> <p>19 membership support. And we just -- we vet --</p> <p>20 you know, we vet them and ensure that they</p> <p>21 are -- that they're saying what they're going to</p> <p>22 do if they get our votes and support.</p> <p>23 Q. Okay. When were you people's chair?</p> <p>24 A. From two thousand and, I believe, '13</p>
<p style="text-align: right;">91</p> <p>1 shot some individuals and...</p> <p>2 Q. Okay. And I should probably clear</p> <p>3 this up. Are you currently a union steward?</p> <p>4 A. No.</p> <p>5 Q. So how do you know about this?</p> <p>6 A. This all transpired during that time</p> <p>7 when I was in my tenure as a steward.</p> <p>8 Q. Were you involved in her grievance?</p> <p>9 A. No. No.</p> <p>10 Q. Then how do you know about it?</p> <p>11 A. I still provide assistance. Even if</p> <p>12 I'm not the second chair, I still provide -- you</p> <p>13 know, I may be called upon by the president just</p> <p>14 as an attorney would have, you know, supportive</p> <p>15 attorneys helping or paralegals helping to</p> <p>16 research and try to defend an individual.</p> <p>17 Q. Since we're kind of on this, let's</p> <p>18 get -- let's get this on the record. I want to</p> <p>19 talk about your union involvement.</p> <p>20 A. Okay.</p> <p>21 Q. So while you have been employed with</p> <p>22 JPD, have you held any role in the union?</p> <p>23 A. Yes.</p> <p>24 Q. All right. And what role have you</p>	<p style="text-align: right;">93</p> <p>1 to '15, I believe.</p> <p>2 Q. And then you also --</p> <p>3 A. Somewhere around there.</p> <p>4 Q. You were union steward, right?</p> <p>5 A. Union steward, yes.</p> <p>6 Q. And what are the dates for that?</p> <p>7 A. I believe -- let's see. It may have</p> <p>8 been two thousand and -- I'm thinking 2008, I</p> <p>9 believe. '8, '9. Somewhere around there. 2008</p> <p>10 or '9, I believe. I can -- I can --</p> <p>11 Q. That's fine. That's good for now.</p> <p>12 Until when?</p> <p>13 A. Until '15. '14, '15. At the end of</p> <p>14 my tenure as a treasurer and then the new</p> <p>15 administration came in, this kind of took up a</p> <p>16 lot of my time.</p> <p>17 Q. When you say "this," what do you mean?</p> <p>18 A. All of these proceedings. This</p> <p>19 lawsuit.</p> <p>20 Q. This lawsuit?</p> <p>21 A. Yes.</p> <p>22 Q. Okay.</p> <p>23 A. Yes.</p> <p>24 Q. What were your duties as a union</p>

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<p style="text-align: right;">94</p> <p>1 steward?</p> <p>2 A. To assist with the grievance process</p> <p>3 on behalf of members, be it as though they may</p> <p>4 be accused or they had some negative impact</p> <p>5 whereby their rights, according to the CBA, was</p> <p>6 being violated by management and a grievance</p> <p>7 needed to be filed or if negotiations needed to</p> <p>8 be ensued.</p> <p>9 Q. All right.</p> <p>10 Why did you become a union</p> <p>11 steward, if you know?</p> <p>12 A. Not a problem. It's ironic. The</p> <p>13 irony of it all.</p> <p>14 The interim director now, Avik</p> <p>15 Das, approached myself, Mr. Nelson, and Jason</p> <p>16 Smith to assist him with, of all things,</p> <p>17 challenging management.</p> <p>18 Q. And what was Mr. Das' union role at</p> <p>19 that time?</p> <p>20 A. He was the president.</p> <p>21 Q. This was in 2008?</p> <p>22 A. This was two thousand -- I want to say</p> <p>23 2008, I believe.</p> <p>24 Q. Okay. When you first became a</p>	<p style="text-align: right;">96</p> <p>1 BY MR. HAYES:</p> <p>2 Q. Let's start with -- are you familiar</p> <p>3 with Kenneth Greenlaw?</p> <p>4 A. Again, Mr. Greenlaw was one of those</p> <p>5 individuals that I work with. I saw him in</p> <p>6 passing. You know, I speak to everyone. I</p> <p>7 speak to him. He kind of -- he was like a</p> <p>8 business guy. He just took care of his</p> <p>9 business.</p> <p>10 Q. But you're aware that he's a Plaintiff</p> <p>11 in this lawsuit as well, right?</p> <p>12 A. Yes.</p> <p>13 Q. And did you socialize with</p> <p>14 Mr. Greenlaw outside of work?</p> <p>15 A. No.</p> <p>16 Q. When was the last time you saw</p> <p>17 Mr. Greenlaw?</p> <p>18 A. It's been over -- maybe -- it's been a</p> <p>19 long time.</p> <p>20 Q. Let's put it this way.</p> <p>21 Have you seen him since his</p> <p>22 termination on April 22, 2014?</p> <p>23 A. Yes. I saw him -- I met with</p> <p>24 Mr. Smith at the AFSCME office downtown</p>
<p style="text-align: right;">95</p> <p>1 steward, is that right, he was the president?</p> <p>2 A. Yes. Yes.</p> <p>3 Q. Okay.</p> <p>4 When you were treasurer in</p> <p>5 2014, 2015, who was the president?</p> <p>6 A. Jason Smith.</p> <p>7 Q. Okay. All right. Now that we got</p> <p>8 that out of the way, let's go back to the</p> <p>9 complaint.</p> <p>10 A. What page?</p> <p>11 Q. Where you're at.</p> <p>12 A. 17.</p> <p>13 Q. I want you to do the same thing that</p> <p>14 you just did for Mr. Jordan do for Kenneth</p> <p>15 Greenlaw. Do you see where Kenneth Greenlaw</p> <p>16 starts?</p> <p>17 A. Uh-huh.</p> <p>18 Q. So he's Paragraph 58 through 63, pages</p> <p>19 17 to 18. Just look that over.</p> <p>20 MR. GEOGHEGAN: Off the record for a</p> <p>21 second.</p> <p>22 (WHEREUPON, a discussion</p> <p>23 was held off the record.)</p> <p>24 MR. GEOGHEGAN: Back on the record.</p>	<p style="text-align: right;">97</p> <p>1 regarding the grievance that was filed on behalf</p> <p>2 of Mr. Greenlaw at the time that Mr. Smith was</p> <p>3 the president.</p> <p>4 Q. All right. It's a nice segue.</p> <p>5 Were you involved in</p> <p>6 Mr. Greenlaw's grievance in any way? His</p> <p>7 grievance regarding his termination in any way.</p> <p>8 A. No. I wasn't directly involved in</p> <p>9 his. I just assisted with the research and</p> <p>10 compiling counter -- counter-evidence to refute</p> <p>11 the charges.</p> <p>12 Q. Okay. You said that you assisted in</p> <p>13 research and compiling evidence.</p> <p>14 A. Uh-huh.</p> <p>15 Q. You said that with Mr. Jordan as well.</p> <p>16 Can you be more specific about what you mean</p> <p>17 when you say that?</p> <p>18 A. Well, in some of these instances, you</p> <p>19 know, when you work at JPD, some of the things</p> <p>20 that they charge, you have some experience in</p> <p>21 it.</p> <p>22 Like, for example, I have had</p> <p>23 to use the vehicles as well as the card because,</p> <p>24 although they have a facilities management and</p>

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<p style="text-align: right;">98</p> <p>1 they have individuals, but it doesn't always 2 happen. 3 So there's -- it's not 4 uncommon to get a vehicle and it doesn't have 5 gas in it. It's not uncommon for the director 6 to have -- actually have used the vehicle for 7 personal use and individuals that he's given 8 these vehicles to to use. 9 So it wasn't really no sign-in 10 sheet. There was no really -- no real 11 designation. Because there was instances where 12 I would need to use a vehicle to transport some 13 kids and there were three or four different gas 14 cards. And my question was, "What's the 15 procedure?" And I would be told, "Just grab 16 one." 17 Q. For you personally? 18 A. Yeah. And just -- 19 Q. Okay. When you had to use the 20 vehicle? 21 A. When I had to use the vehicle. My 22 thing was -- so -- 23 But for me I would take a 24 picture of the gas card, and I would take a</p>	<p style="text-align: right;">100</p> <p>1 something. 2 Q. If you look at 63 there where it says, 3 "Plaintiff Greenlaw was the only probation 4 officer who failed to complete his gas card 5 paperwork, but he was the only probation officer 6 terminated." 7 Do you see that? 8 A. Yes. 9 Q. As you are sitting here today, can you 10 think of another probation officer who failed to 11 complete his gas card paperwork but that was not 12 terminated? 13 A. I can't think of right now, but I just 14 know that there was not a lot of standards in 15 that -- as it related to that department. 16 Q. You say "that department." Do you 17 mean JPD as a whole or -- 18 A. Well, I mean JPD as a whole, but also, 19 too, in the area where we got the gas cards. 20 Q. Oh, I see. 21 A. You know, there was not, like, really 22 a sign-in sheet in and out. It was -- it was 23 just, you know -- there was -- it looked like it 24 was just intentionally that way where, you know</p>
<p style="text-align: right;">99</p> <p>1 picture of the mileage. Because, you know, I'm 2 prior military and I've been already subjected 3 to the discrimination that I have, so... 4 But this is Mr. Greenlaw's 5 day-to-day job. But for me, you know, whenever 6 I'm using it intermittently and I saw that there 7 was, you know, these -- there was no standards 8 as it related to how they checked these things 9 out. 10 Q. Did you -- 11 While you were working there, 12 did you interact with Mr. Greenlaw on a daily 13 basis? 14 A. No. 15 Q. All right. How often would you say 16 you interacted with Mr. Greenlaw while you were 17 both employed with JPD? 18 A. Very rarely. 19 Q. So you don't have any firsthand 20 knowledge of Mr. Greenlaw's use of his gas card; 21 is that right? 22 A. No. 23 Q. All right. 24 A. I just know from my utilizing</p>	<p style="text-align: right;">101</p> <p>1 -- 2 Q. And how often would you say you had to 3 go through that process, use the gas card to get 4 a vehicle? 5 A. Um -- 6 Q. I'm sorry. Gas card -- it's 7 different. Gas card is for your own vehicle; is 8 that right? Or is it for -- 9 A. No, for the County. 10 Q. For the County. 11 A. Yes. While you're using the County 12 vehicle. 13 Q. Got it. 14 A. When I was asked to volunteer to 15 transport families to and from Abraxas, the drug 16 treatment for minors that had to be placed by 17 the courts into drug treatment, a lot of the 18 families were indigent and they couldn't get to 19 Hinsdale or Lake Villa, which is near Wisconsin. 20 So they asked for volunteers. And as a result, 21 you would be paid overtime because it was on the 22 weekends. So that was the trade off. 23 You're -- where you're 24 normally off on the weekends. You're</p>

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<p style="text-align: right;">102</p> <p>1 reenergizing. You would still take the time to 2 help these families to go see their minor who's 3 probably dealing with a lot of issues in order 4 to be drug -- to be ordered to drug treatment. 5 And so those are a lot of the 6 times when I would have access to the vehicle 7 and oftentimes the gas card. 8 Q. All right. 9 How often would you say you 10 had to do that? 11 A. When the program -- when the -- before 12 they changed it, I would want to say around -- 13 from two thousand and maybe '13 to 2015, I 14 believe it was a span of a year, year and a 15 half, whereby I was volunteering until cutbacks 16 and funding for the drug treatment kind of was 17 reduced, which led to reduction in that access 18 for the families. 19 Q. Okay. Do you know how often you were 20 using it? 21 A. We would sign up -- 22 Q. Once a month? 23 A. No. It would be maybe like maybe 24 twice, maybe two, three, maybe twice a month.</p>	<p style="text-align: right;">104</p> <p>1 Q. For your entire tenure there? 2 A. Yes. 3 Q. Do you work with him now? 4 A. No. 5 Q. He's also a field probation officer; 6 is that right? 7 A. Yes. From my understanding now, he's 8 been -- due to his work injury, he's been placed 9 in a different unit, something dealing with 10 clinical support. 11 Q. Okay. 12 A. But he was like I. Our names were 13 pulled out of a hat to determine which of us 14 went to which field unit. 15 Q. Let's -- what field unit are you in 16 now? 17 A. Southeast Division. 18 Q. All right. 19 What are the areas that 20 covers? 21 A. Back of the Yards. Traditionally, it 22 was supposed to be Back of the Yards all the way 23 to fifty -- I want to say all the way to 67th. 24 But, again, due to the discriminatory way that I</p>
<p style="text-align: right;">103</p> <p>1 You know, because you sign up 2 for your availability in advance so they know 3 who would be here on a Saturday. And basically 4 that -- there was no -- again, there was -- you 5 know, there's -- there could be two or three 6 different vehicles and there could be two or 7 three different cars. And who would use those 8 previous to you, you know... 9 MR. HAYES: Okay. We can break now. 10 MR. GEOGHEGAN: Okay. 11 MR. HAYES: Off the record. 12 (WHEREUPON, a brief recess 13 was held.) 14 MR. HAYES: Back on the record. 15 BY MR. HAYES: 16 Q. Mr. Chapman, are you familiar with 17 Patrick Nelson? 18 A. Yes. 19 Q. And who is he? 20 A. He's one of the Plaintiffs. 21 Q. Okay. 22 And you worked with Mr. Nelson 23 in Jumpstart; is that right? 24 A. That's right. Yes.</p>	<p style="text-align: right;">105</p> <p>1 have been treated, I have had kids as far as -- 2 I had a kid as far as 123rd and Wallace. I have 3 a kid that's all the way over in South Shore, 4 near 85th and South Shore. I have -- actually, 5 there were two kids in the South Shore area. 6 I have a kid now that's 900 7 North on the north side. Again, due to the 8 discriminatory way that I'm treated differently, 9 there's different rules that apply to me as it 10 relates to other people because what's 11 traditionally supposed to be one district, 12 I'm -- I have kids all over. 13 Q. To your knowledge, are you the only 14 field probation officer that has kids all over? 15 A. To my knowledge. 16 Q. Okay. So the other officers in this 17 Southeast Division, they don't have to go 18 outside of it? 19 A. To my knowledge, they have their area. 20 To my knowledge, I'm the only one that has kids 21 all over. 22 Q. Have you ever been told why you have 23 kids all over? 24 A. No. Just that they were assigned to</p>

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<p style="text-align: right;">106</p> <p>1 me.</p> <p>2 Q. Okay. Was that relayed to you by your</p> <p>3 supervisor?</p> <p>4 A. Yes.</p> <p>5 Q. All right.</p> <p>6 Going back to Mr. Nelson, are</p> <p>7 you friends with Mr. Nelson?</p> <p>8 A. We have a good working relationship.</p> <p>9 Q. All right.</p> <p>10 Do you -- let's say while you</p> <p>11 worked with him in Jumpstart, did you hang out</p> <p>12 together socially?</p> <p>13 A. No. Unless it was something with --</p> <p>14 usually if it's something -- well, we are --</p> <p>15 You know, usually if it's</p> <p>16 something dealing with the job or they may have</p> <p>17 had something after work, we've gotten -- you</p> <p>18 know, we've gotten together like that. If it</p> <p>19 may have been something where a meeting or</p> <p>20 something that pertained --</p> <p>21 Because we did a lot of the</p> <p>22 same work, a lot of the same volunteer work, we</p> <p>23 were -- you know, we were often together beyond</p> <p>24 our normal work hours, especially if we're</p>	<p style="text-align: right;">108</p> <p>1 things that are going on or meetings, you know,</p> <p>2 but we don't just -- we don't just hang out.</p> <p>3 No.</p> <p>4 Q. When you say "meetings," what</p> <p>5 meetings?</p> <p>6 A. Like if there's something -- because</p> <p>7 we try to stay informed because there's --</p> <p>8 sometimes there's stuff that goes on in the</p> <p>9 communities. Like, if there is resources that</p> <p>10 we can -- there's something going on in the</p> <p>11 communities, like a church is putting it on or</p> <p>12 CPD is putting it on, or even Father Pfleger,</p> <p>13 these things, they have information that</p> <p>14 directly can positively impact our client. So</p> <p>15 we keep each other in the loop in that way.</p> <p>16 And if there is something,</p> <p>17 like Father Pfleger may have an event that we</p> <p>18 feel may be beneficial to our clients, we -- you</p> <p>19 know, we share that information. And we</p> <p>20 usually -- you know, we will meet up and attend</p> <p>21 those type of events.</p> <p>22 Q. Have you talked to Mr. Smith about</p> <p>23 this lawsuit?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">107</p> <p>1 volunteering for the same programs.</p> <p>2 Q. This -- other than, like, work-related</p> <p>3 events outside of work, would you hang out with</p> <p>4 him socially?</p> <p>5 A. No.</p> <p>6 Q. We've talked a lot already about Jason</p> <p>7 Smith. Can you tell me who he is?</p> <p>8 A. Jason Smith is a probation officer.</p> <p>9 Q. All right. Is he in your division</p> <p>10 currently?</p> <p>11 A. No.</p> <p>12 Q. All right.</p> <p>13 And he was a former president</p> <p>14 of the union; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. When you were treasurer?</p> <p>17 A. Yes.</p> <p>18 Q. Would you say you're friends with</p> <p>19 Mr. Smith?</p> <p>20 A. We're -- we're acquainted.</p> <p>21 Q. All right.</p> <p>22 Do you hang out with Mr. Smith</p> <p>23 socially outside of work?</p> <p>24 A. No. We -- we -- I mean, if there are</p>	<p style="text-align: right;">109</p> <p>1 Q. All right. And what have you talked</p> <p>2 to him about?</p> <p>3 A. Just a little bit of everything. You</p> <p>4 know, it's a new experience. This is a new</p> <p>5 experience to me. I don't -- I never thought I</p> <p>6 would be in this position.</p> <p>7 Q. How many times would you say you have</p> <p>8 spoken to Mr. Smith about this lawsuit?</p> <p>9 A. Maybe -- I don't know. I can't really</p> <p>10 say a number.</p> <p>11 Q. More than 12?</p> <p>12 A. I don't know.</p> <p>13 Q. Did -- was Mister --</p> <p>14 Did Mr. Smith have a role in</p> <p>15 your filing charges of discrimination with the</p> <p>16 EEOC?</p> <p>17 A. Did he have a role?</p> <p>18 Q. Yeah.</p> <p>19 A. I guess he had an unintended role. As</p> <p>20 the president he took a certain oath to uphold a</p> <p>21 contract and certain provisions of -- and all</p> <p>22 the provisions of it. And when he became aware</p> <p>23 of the discriminatory practices that spanned,</p> <p>24 you know, over a decade, and then when he</p>

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<p style="text-align: right;">110</p> <p>1 initiated my assistance, I guess indirectly 2 unintendedly I also -- 3 Q. Let me ask you kind of a direct 4 question then. 5 MR. GEOGHEGAN: If you were done. 6 MR. HAYES: Yeah. I'm sorry. He can 7 keep going. Is there anything else? Yeah. Go 8 ahead. 9 THE WITNESS: And as the -- as the 10 time that went into starting to assist him with 11 what he thought may have existed, came to be 12 what not only existed but had been perpetuated 13 for years and years, it came to the point 14 where -- 15 Because I do statistics also 16 being in social work, I posed the question to 17 him, "Is there a monetary issue that somehow 18 you're missing?" And from that he went back and 19 started looking at the potential cost that this 20 type of discrimination that was specifically 21 targeted towards African Americans. 22 And when he shared with me his 23 findings and that it appeared that it was -- 24 it -- the cost that these African-American</p>	<p style="text-align: right;">112</p> <p>1 A. No. 2 Q. Did he have any role in finding your 3 attorney for you? 4 A. No. 5 MR. HAYES: Let's go off the record 6 for a second. 7 (WHEREUPON, a luncheon recess 8 was held.) 9 MR. HAYES: Back on the record. 10 BY MR. HAYES: 11 Q. Mr. Chapman, when we left off, we were 12 going through the complaint, which you still 13 have in front of you. So I want to flip back a 14 little bit to Page 7. Why don't you go to 15 Paragraph 26, please. Do you see Paragraph 26? 16 A. Uh-huh. 17 Q. Okay. It says, "In an effort to 18 substantiate the racially-disparate treatment of 19 African-American probation officers, Local 3477 20 began to compile data reflecting categories of 21 terminations, suspensions, and written or verbal 22 reprimands among population of approximately 400 23 juvenile probation officers for the years 2008 24 thru 2013."</p>
<p style="text-align: right;">111</p> <p>1 officers had been subjected to financially was 2 close -- in excess of over half a million 3 dollars when you add up all of the disciplines, 4 and it could very well easily went back even 5 farther to even over a million. Because this is 6 money that's being removed from their livelihood 7 and their families. 8 BY MR. HAYES: 9 Q. Did Mr. Smith tell you directly to 10 file your charge of discrimination with the 11 EEOC? 12 A. No. No. I'm fully aware of my 13 rights, and I know what discrimination looks 14 like, and the pattern that started being 15 perpetuated and the discrimination, the way I 16 started being treated, the disparate treatment, 17 the bias, the different standards. 18 Q. So he never said anything like, "Hey, 19 Theo, you should file a charge of 20 discrimination?" 21 A. No. 22 Q. All right. 23 Did he tell you you should 24 file a lawsuit?</p>	<p style="text-align: right;">113</p> <p>1 Do you see that? 2 A. Uh-huh. Yes. 3 Q. All right. Were you involved in that 4 compilation of data? 5 A. Not directly. I assisted with helping 6 to put this stuff together, but Mr. Smith as the 7 union president that, for the most part, fell on 8 his responsibility. 9 Q. Okay. 10 When you said "assisting help 11 put it together," what exactly did you do, if 12 anything? 13 A. Making copies of stuff. Some of the 14 cases that I worked with him on with some of 15 this stuff, some of this material, and just, you 16 know, being -- being as helpful as he needed me 17 to be. 18 Q. And then you see in the next 19 paragraph, which is 27 and goes through Page 10 20 to Paragraph 33, lists the years and gives all 21 sorts of percentages. I don't want to go into 22 that right now, but I just want to know if you 23 had any role in compiling these percentages that 24 are in the complaint.</p>

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<p style="text-align: right;">114</p> <p>1 A. As needed. Again, that -- the 2 quantifying it, Mr. Smith took a much greater 3 role as the union president. 4 Q. So looking at Paragraph 27 there, it 5 says, for 2008 there are a total of 12 6 terminations and/or suspensions, of the 12 -- 7 then it breaks down by the numbers. 8 Were you involved in any way 9 in, like, counting these? 10 A. Not that I recall counting. But, 11 again, I recall helping compile the information 12 as it related to being a union steward when 13 dealing with management and trying to defend our 14 members. I do recall helping get the paperwork 15 and everything like that. But as far as 16 quantifying the percentages, as the union 17 president, Mr. Smith had a much greater role. 18 Q. Okay. Turn to Page 10. Look at 19 Paragraph 34 there. "Union Local 3477 also 20 performed an analysis in the labeling utilized 21 by the defendants to describe misconduct 22 allegedly committed by juvenile probation 23 officers during the period 2008 through 2013." 24 Do you see that?</p>	<p style="text-align: right;">116</p> <p>1 defendant, were cited for being romantically and 2 sexually involved with clients -- yet none were 3 terminated or prosecuted." 4 Do you see that? 5 A. Yes. 6 Q. Outside of what's written here, do you 7 have any more information on that? For example, 8 do you know who these probation officers are? 9 A. I've heard their names. The third one 10 I'm familiar with. That would be -- what's her 11 name? I'm familiar with her -- I'm familiar 12 with the most recent one. I've heard, as a 13 steward, about the other two. 14 Q. All right. 15 Were you involved directly as 16 a steward in any of these disciplines or 17 anything? 18 A. No. 19 Q. Do you know if any of these four white 20 female probation officers were disciplined in 21 any way? 22 A. From the -- from the individuals that 23 I -- that I know that work -- that work -- that 24 were around the time that this happened, some of</p>
<p style="text-align: right;">115</p> <p>1 A. Yes. 2 Q. All right. 3 Were you involved in any way 4 in performing an analysis of the labeling as 5 outlined in Paragraph 34? 6 A. No. Again, as I recall, my assistance 7 in the matter was helping compile the 8 documentation. Again, the blunt of it was in 9 the role of the president, Mr. Smith. 10 Q. Okay. 11 All right. Turn to Page 11. 12 In the middle there is a paragraph labeled "32." 13 It's actually between 39 and 40. Do you see 14 that? 15 A. Yes. 16 Q. Okay. 17 A. Yes. Yes. 18 Q. Just look that over. 19 A. Look at No. 32 specifically? 20 Q. Yeah. 21 A. Okay. Yes. 22 Q. All right. Second sentence says, "For 23 example, four white female probation officers, 24 three of whom are presently employed by the</p>	<p style="text-align: right;">117</p> <p>1 which are probably close to retirement now, they 2 indicated that nothing happened to them. 3 Q. Okay. So -- 4 A. They were actually -- 5 Q. Sorry. 6 So the information that you 7 have that nothing happened to them, you received 8 from other individuals; is that right? 9 A. Some of the ones that actually worked 10 with them at that time. 11 Q. Okay. Can you name some names, if you 12 know? 13 A. Carolyn Richardson, Charlie Calvin -- 14 pull from my brain right now -- Argentry 15 Mitchell, Jason Smith. 16 Q. That's fine. That's fine. 17 Okay. I'm going to flip the 18 question around and say, are you aware of any 19 African-American probation officers who were 20 romantically or sexually involved with a client 21 who were terminated? 22 A. No, I'm not. 23 Q. All right. 24 And the last sentence here,</p>

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<p style="text-align: right;">118</p> <p>1 "In another case, a white probation officer was 2 using County funds to purchase purses, but she 3 was not terminated." 4 Were you directly involved in 5 that situation? 6 A. No. But I've been made familiar about 7 it. 8 Q. That's fine. I'm going to do the same 9 thing. 10 Are you aware of any 11 African-American probation officer who was using 12 County funds to purchase purses that was 13 terminated? 14 A. No. 15 Q. All right. 16 Okay. And then if you go down 17 to Paragraph 41, just on that page. Yeah. I'll 18 read it. "The union has also directly notified 19 defendant Chief Judge of several examples of the 20 disparate treatment of African-American juvenile 21 probation officers by his subordinates in the 22 Cook County Juvenile Probation Department." 23 Do you see that? 24 A. Yes.</p>	<p style="text-align: right;">120</p> <p>1 grievance hearings? 2 A. Yes. 3 Q. All right. The next paragraph is 41. 4 Oh, sorry. We were going to -- actually, we're 5 going to turn the page to forty -- sorry. 46 on 6 Page 12. 7 Okay. 46 reads, "These acts 8 have resulted in disparate treatment of juvenile 9 probation officers on the basis of their race, 10 including" -- and then it lists several 11 individuals. 12 And so I just want to go 13 through this quickly, Mr. Chapman, and just see 14 if you have any direct personal knowledge of any 15 of this. If it's not direct or personal, you 16 know, it's -- I don't need to know about it. 17 A. Personal meaning I've handled the 18 case? 19 Q. You got it. 20 A. Or personal meaning I know the person? 21 Q. That you handled the case -- 22 A. Okay. 23 Q. -- that allegation. 24 A. Got you.</p>
<p style="text-align: right;">119</p> <p>1 Q. All right. 2 You personally, have you ever 3 directly notified Chief Judge Evans of disparate 4 treatment of African-American juvenile probation 5 officers? 6 A. Yes, I have. 7 Q. All right. When? 8 A. During my own grievance hearings. 9 Q. All right. And Chief Judge Evans was 10 there? 11 A. No. He wasn't there. It was always 12 his designee. 13 Q. Okay. I just want to be clear of 14 that. 15 A. Yeah. 16 Q. Were you directly telling in person 17 Chief Judge Evans? 18 A. No. No. 19 Q. Okay. But you were telling -- go 20 ahead. Tell me who you told then. 21 A. His designees. 22 Q. All right. 23 A. Keith Sevvick. 24 Q. And this would have been in your</p>	<p style="text-align: right;">121</p> <p>1 Q. Okay. So the first one is Emily 2 Pierce. Did you handle her discipline? 3 A. No. 4 Q. Christen Loeb, L-o-e-b? 5 A. Loeb. 6 Q. Loeb, okay. 7 Did you handle that 8 discipline? 9 A. No. 10 Q. All right. And staying on B there, 11 but it kind of bleeds into this Page 13. It 12 says at the bottom of 12, "Deputy Chief 13 Probation Officer Virginia Caulfield stated that 14 she would never discipline Ms. Loeb." 15 Do you see that? 16 A. Yes. 17 Q. Did you hear Ms. Caulfield say that? 18 A. No. 19 Q. All right. The next one is Lauren 20 Brown. Were you involved in that at all? 21 A. No. 22 Q. All right. Next one is Kevin Gavin. 23 Were you involved in that at all? 24 A. No.</p>

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<p style="text-align: right;">122</p> <p>1 Q. The next one is Kalthea, 2 K-a-l-t-h-e-a, Seay, S-e-a-y. Were you involved 3 in that one? 4 A. It's pronounced Kalthea. 5 Q. Oh, thank you. 6 A. No. 7 Q. All right. Next up is Julie 8 Montgomery. Were you involved in that? 9 A. Yes. 10 Q. Okay. What was your role in that one? 11 A. I was the co-chair. 12 Q. What does that mean? 13 A. That means I was a second steward on 14 the case. 15 Q. And who was the first steward? 16 A. The first steward was Lloyd Marshall. 17 Q. I don't think it says in here about 18 the year. Do you know approximately when this 19 happened? 20 A. It had to be about maybe, I'm 21 thinking, three -- three or four years ago. 22 Q. All right. 23 A. Yeah. Because this is '17. So yeah. 24 That would have been around -- around that time.</p>	<p style="text-align: right;">124</p> <p>1 A. Yes. 2 Q. Okay. 3 All right. So knowing that 4 that's the only time that you were involved, 5 what was your specific involvement? 6 A. I was the co-assistant as a steward, 7 union steward. 8 Q. And what does that mean? 9 A. That means I was actually helping with 10 the case and compiling information to counter 11 the allegations that management were making and 12 present a defense for our member. 13 Q. And what was the outcome of that 14 grievance? 15 A. Management terminated her. 16 Q. In the paragraph it says -- 17 A. She was forced to resign. 18 Q. -- she had to resign under duress. 19 A. Yes. 20 Q. So she resigned, right? She wasn't 21 discharged? 22 A. It was kind of like what they call 23 forced coercion. 24 Q. I mean, I don't want to get into</p>
<p style="text-align: right;">123</p> <p>1 Q. Around '14? 2 A. Around '14, I'm thinking. 3 Q. But you don't know for sure? 4 A. Not for sure. 5 Q. All right. 6 And you were in the second 7 chair. What specifically did you do, if 8 anything, on this? 9 A. Just so you know -- 10 Q. Yeah. 11 A. -- there's two instances with this. 12 Q. Okay. 13 A. There was a time that predated my 14 involvement where she was given a Last Chance 15 Agreement. That predated my involvement. I 16 came in on this second -- where it says, 17 "Department attempted to construct another 18 reason to create a disciplinary investigation." 19 That's where I was in because there's two 20 different. 21 Q. Okay. 22 A. So just so you are aware. 23 Q. So the sentence that begins "After her 24 disciplinary sentence?"</p>	<p style="text-align: right;">125</p> <p>1 semantics. 2 A. Okay. 3 Q. But she resigned; is that right? 4 A. Yes. 5 Q. Okay. I think the next one is G, Joi 6 Basley, J-o-i, B-a-s-l-e-y. 7 A. Right. 8 Q. Did I pronounce those right? 9 A. Joi Basley. 10 Q. Were you involved in that one? 11 A. No. This, again, is -- this is a -- 12 there is a predated, which is this, the -- 13 Q. Last Chance Agreement? 14 A. Right. I didn't work directly on 15 Ms. Basley. No. 16 Q. All right. Next one is H, Angela 17 Sneed. 18 A. No. 19 Q. Okay. This term has come up recently 20 and it's in the complaint here, "Last Chance 21 Agreement." Can you tell me what your 22 understanding is of the Last Chance Agreement? 23 A. Last Chance Agreements actually 24 violate our Collective Bargaining Agreement in</p>

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<p style="text-align: right;">126</p> <p>1 that there is no provision in the Collective 2 Bargaining Agreement where this exists. 3 It appears to be, from my 4 tenure as a steward, something that was 5 specifically created for and -- for blacks or 6 African-American probation officers. It has -- 7 even in -- with its violation of the CBA, it 8 also presents no sunset clause or sunset data 9 upon which it's even to be removed. 10 Q. Well, yeah. What is it? 11 A. It's basically -- it's kind of like a 12 mob tactic, actually. Whereas, the next time I 13 come at you, I want your finger, I want your 14 arm. You know, it's kind of like that. 15 Q. I think I'm getting what your 16 opinion -- I guess what -- 17 MR. GEOGHEGAN: He wants just an 18 explanation of what the Last Chance Agreement 19 is. 20 THE WITNESS: All right. Well, what 21 happens is with the black officers, there's two 22 sets of standards. 23 BY MR. HAYES: 24 Q. Again, I just want to know what a Last</p>	<p style="text-align: right;">128</p> <p>1 A. It's basically noting that if there's 2 anything, not necessarily you have to be guilty 3 of, but if there's anything, allegation or 4 anything, it doesn't necessarily have to be 5 founded, you can be terminated. 6 Q. And focus on your time -- let's back 7 up. 8 Did you ever receive a Last 9 Chance Agreement? 10 A. Oh, no. 11 Q. Okay. In your time as a union steward 12 or involved with the union, 2008-2015, how many 13 Last Chance Agreements would you say you saw 14 then? 15 A. I saw Mr. Jordan's after I became a 16 steward and working on his case. Yeah. From my 17 recollection, Mr. Jordan's and I'm -- I don't 18 know that -- I know Mr. Jordan's. I may have 19 saw Ms. Basley's, but I know I saw Anthony 20 Jordan's. 21 Q. Okay. 22 To your knowledge, did any 23 non-African-American juvenile probation officer 24 ever receive a Last Chance Agreement?</p>
<p style="text-align: right;">127</p> <p>1 Chance Agreement is. 2 A. It's -- 3 Q. I know -- I understand your position, 4 Mr. Chapman. We'll be here a lot longer if you 5 do that every time and I understand. But I just 6 need you to tell me right now what a Last Chance 7 Agreement is. 8 A. It's a condition upon remaining 9 employed. It's a condition. 10 Q. So maybe we can unpack it. Is it 11 presented to an employee -- is it in place of 12 discipline or in addition to discipline? 13 A. In addition. 14 Q. Okay. And I mean -- I guess, let's go 15 back. 16 Have you seen -- have you, 17 like, physically seen Last Chance Agreements? 18 A. I have. 19 Q. All right. And I don't have one with 20 me, unfortunately, but can you summarize, like, 21 basically what it says. Does it say something 22 along the lines, "If you do something again you 23 are going to be fired?" Or am I wrong? What 24 does it say?</p>	<p style="text-align: right;">129</p> <p>1 A. To my knowledge, no. 2 Q. Okay. We're sticking with the 3 complaint, but let's go and turn the page to 4 your section, Mr. Chapman, your specific 5 allegations, which are on Paragraphs 64 to 67, I 6 believe. And that's Page 18 to 19. You got 7 that? 8 A. Yes. 9 Q. Okay. If you want -- if you're not 10 familiar with it, do you want to take a minute 11 to look it over or do you just want me to go? 12 MR. GEOGHEGAN: Just for the record, 13 there are other allegations about him that 14 continue on under the Nelson section. 15 MR. HAYES: Oh, yeah. 16 THE WITNESS: Okay. 17 BY MR. HAYES: 18 Q. Okay. Now, I'm just going to ask you 19 a few questions. 20 A. Sure. 21 Q. So starting in Paragraph 64 -- we went 22 over a lot of your background stuff. It says 23 you have no history of discipline. Is that 24 still a true statement?</p>

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<p style="text-align: right;">130</p> <p>1 A. That's still true.</p> <p>2 Q. All right. No suspensions? No --</p> <p>3 A. Still true.</p> <p>4 Q. Okay. And I want to talk about the</p> <p>5 last sentence there. "For these efforts,</p> <p>6 Mr. Chapman has received commendations and merit</p> <p>7 bonus payments."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. What's a merit bonus payment?</p> <p>11 A. Merit is if you -- when you exceed on</p> <p>12 your evaluation, with exceeding comes a merit</p> <p>13 bonus. That's kind of divided amongst all of</p> <p>14 the probation officers that exceed. It may show</p> <p>15 up as a few hundred bucks on the paycheck. But</p> <p>16 more than anything, you exceed. When you exceed</p> <p>17 it comes with it.</p> <p>18 Q. How many times would you guess you</p> <p>19 received a merit bonus payment?</p> <p>20 A. Out of the 14 years? I just recently</p> <p>21 went in my arbitration for my 13 and 14. I</p> <p>22 would say 13 years.</p> <p>23 Q. And that means you have an exceeded</p> <p>24 level on your --</p>	<p style="text-align: right;">132</p> <p>1 bonus, if you know?</p> <p>2 A. I believe it was maybe almost \$400, I</p> <p>3 think.</p> <p>4 Q. Okay.</p> <p>5 All right. Can you turn to</p> <p>6 Paragraph 65, which is on the next page, Page</p> <p>7 19. All right. And this is talking about the</p> <p>8 supervisory examination. Are you familiar with</p> <p>9 that?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. It says here that you took it</p> <p>12 in November of 2007 and February of 2012; is</p> <p>13 that right?</p> <p>14 A. Yes.</p> <p>15 Q. Did you take it any other times?</p> <p>16 A. No.</p> <p>17 Q. Has it been offered since 2012?</p> <p>18 A. Yes.</p> <p>19 Q. How many times since 2012? Again, I</p> <p>20 got -- just once?</p> <p>21 A. Once.</p> <p>22 Q. And when was that, if you know?</p> <p>23 A. This is '17. I believe it was offered</p> <p>24 in '15.</p>
<p style="text-align: right;">131</p> <p>1 A. Yes.</p> <p>2 Q. -- performance review?</p> <p>3 A. Yes. Above and beyond.</p> <p>4 Q. And are you getting reviewed once a</p> <p>5 year?</p> <p>6 A. Yes.</p> <p>7 Q. Every year you have gotten one?</p> <p>8 A. Annually, yes.</p> <p>9 Q. When was the last merit bonus payment</p> <p>10 you got?</p> <p>11 A. 2016.</p> <p>12 Q. Would that have been for your -- what</p> <p>13 performance review would that have been for?</p> <p>14 A. That was for 2016.</p> <p>15 Q. 2016. Okay.</p> <p>16 A. So at the end of 2016 around November,</p> <p>17 depending on fiscal -- the fiscal year, we</p> <p>18 usually end the end of November. Usually the</p> <p>19 supervisors start compiling everything and</p> <p>20 notating their notes throughout the monthly</p> <p>21 meetings that we have with the supervisors. And</p> <p>22 then by January/February we generally get our</p> <p>23 evaluations.</p> <p>24 Q. And how much was your 2016 merit</p>	<p style="text-align: right;">133</p> <p>1 Q. All right. And you didn't take that</p> <p>2 one?</p> <p>3 A. No.</p> <p>4 Q. Between 2007 and 2012 was it offered,</p> <p>5 if you remember?</p> <p>6 A. Say that again.</p> <p>7 Q. Let me try to get at this a different</p> <p>8 way.</p> <p>9 How often is it offered?</p> <p>10 A. There's no rhyme or reason. There's</p> <p>11 no, like, every three years or -- it's just</p> <p>12 whenever they -- management randomly wants to do</p> <p>13 it.</p> <p>14 Q. Between 2007 and 2012, do you know if</p> <p>15 it was offered in between those years?</p> <p>16 A. No, it wasn't because I would have</p> <p>17 taken it.</p> <p>18 Q. Okay. Can you tell me in detail what</p> <p>19 the exam process entails.</p> <p>20 A. Once they announce that they're going</p> <p>21 to be giving the examination, you simply write a</p> <p>22 note to management requesting that you be placed</p> <p>23 on the list to take it on the date that they</p> <p>24 set. And they'll send you a notice saying</p>

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<p style="text-align: right;">134</p> <p>1 you're -- giving you the date when it's going to</p> <p>2 be administered, and basically you're on the</p> <p>3 list to take it.</p> <p>4 Q. And it's a written exam; is that</p> <p>5 right?</p> <p>6 A. Yes. It's more so like a survey, but</p> <p>7 go ahead.</p> <p>8 Q. But is it in writing?</p> <p>9 A. Yes.</p> <p>10 Q. It's a piece of paper or pieces of</p> <p>11 paper?</p> <p>12 A. Yes. Yes.</p> <p>13 Q. Okay. Do you need to pass that exam</p> <p>14 to become a supervisor at JPD?</p> <p>15 A. Yes.</p> <p>16 Q. And then what positions do you qualify</p> <p>17 for if you pass this exam?</p> <p>18 A. Per?</p> <p>19 Q. Like, what title?</p> <p>20 A. Supervisor. SPO. Supervising</p> <p>21 probation officer.</p> <p>22 Q. Okay. And that would be, like, the</p> <p>23 one level above field probation officers; is</p> <p>24 that right?</p>	<p style="text-align: right;">136</p> <p>1 Act; looked at the major court cases. There's,</p> <p>2 like, at least four or five. I looked at the</p> <p>3 different court procedures, being in violations,</p> <p>4 what constitutes sentencing and dispo trial, the</p> <p>5 whole court process. Looked at all the</p> <p>6 different specialized units where minors can be</p> <p>7 referred to for the different -- for the</p> <p>8 different issues that they may have that these</p> <p>9 programs could benefit them for the services</p> <p>10 that they provide like drug treatment, so on and</p> <p>11 so forth.</p> <p>12 So I made myself knowledgeable</p> <p>13 of the different court programs, like the</p> <p>14 computerized programs that are -- that are</p> <p>15 utilized in the day-to-day duties as a probation</p> <p>16 officer, which is the JEMS system that I talked</p> <p>17 about, the YAZI (phonetic) which is an</p> <p>18 assessment tool to determine the risk factor of</p> <p>19 a minor, low, medium or high, which determines</p> <p>20 how often a minor is to be seen and also it</p> <p>21 looks at where the minor's strengths and</p> <p>22 weaknesses are, where their support is and where</p> <p>23 support is needed.</p> <p>24 I looked at the different</p>
<p style="text-align: right;">135</p> <p>1 A. Numerically, it's called a PO III.</p> <p>2 Q. Okay. Numerically, what are you now?</p> <p>3 A. PO II.</p> <p>4 Q. PO II. Okay.</p> <p>5 And when you took these exams</p> <p>6 in 2007, 2012, you were at Jumpstart?</p> <p>7 A. Yes.</p> <p>8 Q. You were in Jumpstart?</p> <p>9 A. Yes.</p> <p>10 Q. All right.</p> <p>11 In that Paragraph 65 at the</p> <p>12 bottom there, it says, "Despite diligent</p> <p>13 preparation for the examinations."</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Could you tell me what you mean by</p> <p>17 "diligent preparation?"</p> <p>18 A. I --</p> <p>19 Q. And if you need to break it down for</p> <p>20 each one, that's fine, or if you need to do the</p> <p>21 same thing.</p> <p>22 A. Not a problem. I went back to the</p> <p>23 information that I -- that I was trained on as a</p> <p>24 PO during training, which is the Juvenile Court</p>	<p style="text-align: right;">137</p> <p>1 programs that offer -- outside the court that</p> <p>2 offer support that are in conjunction with the</p> <p>3 courts. And these include some of the</p> <p>4 faith-based organizations that work with the</p> <p>5 courts and what they do. I looked at the</p> <p>6 hierarchy, how the department is, the managerial</p> <p>7 tree. I looked at, also, the day-to-day</p> <p>8 procedures and each of the units, whether it be</p> <p>9 specialized or field -- field officer.</p> <p>10 Q. Let me stop you there.</p> <p>11 Were the -- is the test geared</p> <p>12 for the department as a whole or more towards</p> <p>13 the field officer position?</p> <p>14 A. It's actually supposed to be</p> <p>15 comprehensive.</p> <p>16 Q. After taking it what would you say?</p> <p>17 A. It was more so subjective, and it was</p> <p>18 more like a survey where it was utilized --</p> <p>19 because I've created surveys, and it did nothing</p> <p>20 to gauge my knowledge of the department and how</p> <p>21 the department and the programs and services are</p> <p>22 to be centered as a supervisor that you would be</p> <p>23 kind of in that role to ensure that your</p> <p>24 officers or your subordinates would be utilizing</p>

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<p style="text-align: right;">138</p> <p>1 or doing on a day-to-day. It was more so a</p> <p>2 survey to see if you were someone that</p> <p>3 management could possibly see as being</p> <p>4 management one day.</p> <p>5 Q. Okay. When you were preparing for</p> <p>6 this, did you study with anyone else?</p> <p>7 A. Oh, I studied with quite a few</p> <p>8 different people.</p> <p>9 Q. All right. Who?</p> <p>10 A. Russell Akis.</p> <p>11 Q. Anyone else?</p> <p>12 A. Russell Akis. There was a couple</p> <p>13 study groups. I think it was one -- Kisha</p> <p>14 Roberts, we may have exchanged some information.</p> <p>15 Q. Well, let me put it this way.</p> <p>16 A. But --</p> <p>17 Q. If you know anyone that you studied</p> <p>18 with, did they pass the exam?</p> <p>19 A. No.</p> <p>20 Q. Okay. And was everyone you studied</p> <p>21 with African American?</p> <p>22 A. Yes.</p> <p>23 Q. Mr. Nelson took it as well, right?</p> <p>24 A. Yes. He's taken it, I think, once.</p>	<p style="text-align: right;">140</p> <p>1 A. William Patterson.</p> <p>2 Q. And who's William Patterson?</p> <p>3 A. He's the HR director.</p> <p>4 Q. Okay. What's Mr. Patterson's race?</p> <p>5 A. He's African American.</p> <p>6 Q. And what did he tell you? This was in</p> <p>7 2012?</p> <p>8 A. I believe it was -- he -- I believe he</p> <p>9 was -- it might have been either him -- let's</p> <p>10 see. Who preceded him? Charles Young, I</p> <p>11 believe, preceded him.</p> <p>12 It's been a while, but I went</p> <p>13 directly to the source this time, which was HR.</p> <p>14 And I believe it was either Mr. Patterson or</p> <p>15 Mr. Young, and I was denied. That -- that that</p> <p>16 was not going to happen. That, no, I could not</p> <p>17 see it. And I just asked, "Well, could I sit</p> <p>18 down and just see my test?"</p> <p>19 I even asked can I see the</p> <p>20 answer sheet, just where I got the answers wrong</p> <p>21 so that I can actually see myself that I got</p> <p>22 these wrong.</p> <p>23 Q. What did they say?</p> <p>24 A. No. It was denied.</p>
<p style="text-align: right;">139</p> <p>1 Yes. I think he's taken it once or twice. It</p> <p>2 may have been before my tenure.</p> <p>3 Q. Okay. And on Paragraph 65, on both</p> <p>4 occasions you requested copies of your test?</p> <p>5 A. Yes.</p> <p>6 Q. And were denied; is that right?</p> <p>7 A. That's correct.</p> <p>8 Q. So how did you request copies?</p> <p>9 A. As they were set, the standard was to</p> <p>10 go to the union and ask for a copy of your test,</p> <p>11 which I did. And at that time I was informed</p> <p>12 management denied the request.</p> <p>13 Q. So you went through the union?</p> <p>14 A. That was standard to go through the</p> <p>15 union. At the time, I believe, Mike Willis was</p> <p>16 the president who preceded Jason, as well as</p> <p>17 Avik Das. And then the last time --</p> <p>18 Q. Were you -- were you offered any other</p> <p>19 options about reviewing it? Like sitting down</p> <p>20 and looking it over or anything like that?</p> <p>21 A. I requested to actually have a sit</p> <p>22 down. And the second one I actually went up to</p> <p>23 HR myself and requested it.</p> <p>24 Q. And who did you request that to?</p>	<p style="text-align: right;">141</p> <p>1 Q. Okay. Did they give you any option at</p> <p>2 all to somehow view your test or anything like</p> <p>3 that?</p> <p>4 A. No.</p> <p>5 Q. Okay. Did they give you a reason as</p> <p>6 to why you couldn't do it?</p> <p>7 A. No. Just that it's never been -- it's</p> <p>8 not allowed.</p> <p>9 Q. Okay. Do you know of anyone else who</p> <p>10 asked for -- to review their test?</p> <p>11 A. Yes, I do. Michael Porter.</p> <p>12 Q. And was he denied?</p> <p>13 A. He was denied at first, but he kind of</p> <p>14 went through other channels. I don't know --</p> <p>15 and he was able to get a meeting. And the union</p> <p>16 as well as management allowed Charles Young, at</p> <p>17 the time, allowed him to see his test.</p> <p>18 Q. Okay. So Porter's race?</p> <p>19 A. African American.</p> <p>20 Q. All right. Mr. Young's race?</p> <p>21 A. African American.</p> <p>22 Q. Okay.</p> <p>23 As you are sitting here, do</p> <p>24 you know of any non -- any non-African Americans</p>

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<p style="text-align: right;">142</p> <p>1 who asked to see their test and were denied?</p> <p>2 A. No. Because usually non-African</p> <p>3 Americans had no problems because --</p> <p>4 Q. I just need you to answer the</p> <p>5 question, Mr. Chapman.</p> <p>6 A. No.</p> <p>7 Q. Okay. Thanks.</p> <p>8 Are you aware of any</p> <p>9 non-African-American field probation officers,</p> <p>10 so whites, Latinos or whatever, who also failed</p> <p>11 either the 2007 or 2012 exams?</p> <p>12 A. Any non-African American that failed</p> <p>13 it?</p> <p>14 Q. Yeah.</p> <p>15 A. No.</p> <p>16 Q. And did you file a grievance on this</p> <p>17 issue, if you know?</p> <p>18 A. It's -- according to them it's</p> <p>19 non-grievable.</p> <p>20 Q. You say "according to them." Who is</p> <p>21 that?</p> <p>22 A. Management.</p> <p>23 Q. Do you remember who told you that?</p> <p>24 A. Management.</p>	<p style="text-align: right;">144</p> <p>1 Q. All right.</p> <p>2 A. There's no proctor. There's no</p> <p>3 outside agency. It's deputies and management.</p> <p>4 There's no secure box. There's no lockbox. Put</p> <p>5 it in front of them in just a little bin where</p> <p>6 they collect them.</p> <p>7 Q. Did you file -- so you said it's not</p> <p>8 grievable, but did you file an EEOC charge on</p> <p>9 this issue?</p> <p>10 A. It's noted in my EEOC complaint later,</p> <p>11 that came later from other discrimination that</p> <p>12 --</p> <p>13 Q. Well, we are going to go through them,</p> <p>14 so that's why I just wanted to ask.</p> <p>15 A. Okay.</p> <p>16 Q. Next paragraph in the complaint,</p> <p>17 Paragraph 66. It says in there "that a</p> <p>18 disproportionate number of African-American</p> <p>19 probation officers, some with advanced graduate</p> <p>20 degrees, are advised that they supposedly failed</p> <p>21 the supervisory examination."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Other than the ones you mentioned, can</p>
<p style="text-align: right;">143</p> <p>1 Q. Who specifically?</p> <p>2 A. Charles Young.</p> <p>3 Q. Okay. Okay.</p> <p>4 I'm sorry. Who is Charles</p> <p>5 Young?</p> <p>6 A. He was the director of HR. He was the</p> <p>7 deputy director next to Mike Rohan who was the</p> <p>8 director.</p> <p>9 Q. Okay. Got it.</p> <p>10 A. And then William Patterson replaced --</p> <p>11 it was Rose Golden before William Patterson.</p> <p>12 She was the HR director. That was the chain.</p> <p>13 It was Charles Young, deputy director, Rose</p> <p>14 Golden, and then William Patterson. When Rose</p> <p>15 retired William Patterson became the new HR</p> <p>16 director.</p> <p>17 Q. Okay.</p> <p>18 And when you say "HR," it's</p> <p>19 just for JPD, right?</p> <p>20 A. Yes. JPD Human Resources Department.</p> <p>21 Q. And human resources is the one -- they</p> <p>22 are the ones that, like, administered the exam?</p> <p>23 Is that your understanding?</p> <p>24 A. All of management administers it.</p>	<p style="text-align: right;">145</p> <p>1 you give me any other -- can you give me</p> <p>2 specific individuals who have advanced --</p> <p>3 besides yourself obviously --</p> <p>4 A. Um --</p> <p>5 Q. Let me just get the question out so</p> <p>6 it's on the record.</p> <p>7 A. Sure.</p> <p>8 Q. Anyone else -- any other African</p> <p>9 American probation officer with an advanced</p> <p>10 graduate degree who failed the supervisory exam</p> <p>11 either in '7 or '12?</p> <p>12 A. Yeah. There was Michelle Bailey. I</p> <p>13 believe she has a master's also. Mitchell</p> <p>14 Kennard (phonetic), Richard Russell, Mike</p> <p>15 Porter.</p> <p>16 Q. And they all have advanced degrees, to</p> <p>17 your knowledge?</p> <p>18 A. To my knowledge.</p> <p>19 Q. Okay. And by "advanced degree" I mean</p> <p>20 post bachelors.</p> <p>21 A. Yes. Some more names may come up, but</p> <p>22 right now those definitely resonated.</p> <p>23 Q. Okay.</p> <p>24 And I can't remember if I</p>

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<p style="text-align: right;">146</p> <p>1 asked you this or not, Mr. Chapman, but can you</p> <p>2 think of any non-African Americans who failed</p> <p>3 the exam and were allowed to review it?</p> <p>4 A. No, I can't.</p> <p>5 Q. Okay. If you know, do you know who</p> <p>6 grades the exams?</p> <p>7 A. I've asked that and it's always</p> <p>8 been -- it's always been something of secrecy.</p> <p>9 There's no -- there's no knowledge of it.</p> <p>10 There's no, like -- there's no proctor. There's</p> <p>11 no outside agency that's contracted. It's</p> <p>12 unknown.</p> <p>13 Q. All right.</p> <p>14 So it's kind of -- when you go</p> <p>15 and take the exam, are you in a room with other</p> <p>16 officers?</p> <p>17 A. There's -- all of us are in there. We</p> <p>18 all come up to the desk where management is</p> <p>19 sitting. And our name is noted right there and</p> <p>20 then they give us a copy of the test.</p> <p>21 At one point the first -- when</p> <p>22 I took it the first time, they had a little</p> <p>23 scantron with a UIC watermark on it. But as a</p> <p>24 union steward, we looked into that, and there</p>	<p style="text-align: right;">148</p> <p>1 discriminatory?</p> <p>2 A. Good question. The director, Mike</p> <p>3 Rohan, created an in-house, supposedly, clinical</p> <p>4 unit. The unit was comprised of -- which became</p> <p>5 to be comprised of all white officers.</p> <p>6 Q. Let's -- I will stop you because I</p> <p>7 know you mentioned him and I know who he is, but</p> <p>8 for the record I want -- Mike Rohan, who is he?</p> <p>9 A. He's the former director of</p> <p>10 juvenile -- juvenile -- JPD.</p> <p>11 Q. When did his tenure end, if you know?</p> <p>12 A. I believe it was around the time we</p> <p>13 filed the lawsuit, about two thousand and maybe</p> <p>14 '15.</p> <p>15 Q. Okay. That's fine.</p> <p>16 And, again, for the record,</p> <p>17 his race is?</p> <p>18 A. He's white. Caucasian.</p> <p>19 Q. All right.</p> <p>20 A. And --</p> <p>21 Q. Go ahead. Sorry.</p> <p>22 A. And the second test seemed to have an</p> <p>23 insurmountable number of questions that</p> <p>24 pertained to clinical knowledge or someone that</p>
<p style="text-align: right;">147</p> <p>1 was no identification of a contract with UIC and</p> <p>2 Probation to proctor exams.</p> <p>3 And then on the second one,</p> <p>4 there was a booklet and then there was a paper</p> <p>5 sheet which you answered. So for the extent of</p> <p>6 it, the credibility of it, you know, came into</p> <p>7 question especially on the second one because it</p> <p>8 was the same process. You're giving it to</p> <p>9 management and there's, like, no proctor.</p> <p>10 There's no security guard. There's --</p> <p>11 And even with our union</p> <p>12 elections, we had a box with a lock on it. We</p> <p>13 had at least four different people from</p> <p>14 different places that actually helped give the</p> <p>15 results credibility.</p> <p>16 Q. And staying on Paragraph 66 towards</p> <p>17 the end there, it says, "And that the designing</p> <p>18 of the supervisory examination is either</p> <p>19 intentionally, or in effect discriminatory in</p> <p>20 excluding African Americans from supervisory</p> <p>21 positions."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. How is the design of the exam</p>	<p style="text-align: right;">149</p> <p>1 had went through some clinical training.</p> <p>2 Q. What do you mean by "clinical</p> <p>3 training?"</p> <p>4 A. Well, it was more so questions that</p> <p>5 gauged your knowledge of a particular type of</p> <p>6 background or a particular type of knowledge</p> <p>7 base. Like, if you studied law, these</p> <p>8 questions -- the questions could mostly be</p> <p>9 law-based questions that someone who studied law</p> <p>10 would definitely be able to understand. In this</p> <p>11 case, there was an insurmountable number of</p> <p>12 questions on this particular -- the last test</p> <p>13 that I took --</p> <p>14 Q. 2012?</p> <p>15 A. Yes.</p> <p>16 -- that were geared towards</p> <p>17 those with a clinical basis of understanding.</p> <p>18 Q. So in your department what is a</p> <p>19 clinical basis of understanding?</p> <p>20 A. Well, clinical is dealing with, like,</p> <p>21 clinical psychology. They created a clinical</p> <p>22 unit that was supposed to address the needs of</p> <p>23 minors in house by being able to refer as</p> <p>24 opposed to referring them to the community in</p>

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<p style="text-align: right;">150</p> <p>1 which they live for the programs that existed in 2 their community. So this was supposed to 3 address that need that existed where clients 4 might have needed more clinical services. 5 There was the absence of not 6 only on the first test, but there was really an 7 absence on the second test of anything that 8 related to the day-to-day duties of which mostly 9 makes up field officer work. The department is 10 overwhelming 60 -- about 65, 70 percent field 11 officers. 12 Q. At the time of -- let's focus -- or -- 13 well, either one. 2007, 2012, you were not a 14 field probation officer, right? 15 A. I was not a field officer. I was in 16 Jumpstart. 17 Q. Okay. At the time -- 18 A. Which was a specialized unit. 19 Q. Yeah. 20 But at the time of these 21 exams, were you aware of what field probation 22 officers had to do? 23 A. I was. Because I actually -- with 24 Jumpstart, many of the field officers referred</p>	<p style="text-align: right;">152</p> <p>1 Q. And that -- did you say you 2 received -- 3 When you started you 4 received -- did you receive field training as 5 well when you started? 6 A. Well, when you receive training, 7 you're actually trained to be a probation 8 officer in all aspects of the department. The 9 field officer just goes into a day-to-day of it. 10 Specialized units may create a specialty 11 specific to the needs of a client as it relates 12 to the department. But when you are trained, 13 you are trained to be an officer, for the most 14 part as a field officer. 15 Q. Okay. 16 A. You always need to be retrained when 17 you go into a specialized unit because there's a 18 lot of specificity with that. Like the drug 19 unit, that's something we were, you know, given 20 information about during training. But for the 21 most part, our training consisted of being a 22 field probation officer because that entails 23 most of the department. 24 Q. Okay.</p>
<p style="text-align: right;">151</p> <p>1 clients to Jumpstart. That's how their clients 2 came. Many a times they shared the information, 3 whether it be the social, different other 4 services the minor might be receiving at the 5 time in addition to Jumpstart. 6 So it was more so Jumpstart 7 became a wraparound service, but it was also one 8 of the major components because school is 9 mandatory. When judges order school and it's 10 mandatory, we're talking about a minor, so they 11 have to be in school. Otherwise, they are just 12 out there during the time when they could 13 recidivate very easily. 14 So I became acquainted with 15 pretty much, you know, working with these 16 different officers. And so many of them 17 referred kid after kid because of the success 18 that we had with some of their most difficult 19 clients. 20 Q. And you said you reviewed field 21 materials, right, as well? 22 A. Right. 23 Q. In preparation for the exam? 24 A. Yes.</p>	<p style="text-align: right;">153</p> <p>1 Is there any other way that 2 you believe that the design of the exam was 3 discriminatory other than the clinical thing we 4 talked about? 5 A. It almost -- for me a 70 would have 6 been just my base score. I have military 7 experience, which that would have boosted me up 8 another 20 points. Then my year of service in 9 the department, that would have given me another 10 10 points. So I could have very well been 11 number one on the list with just a 70. 12 Q. In the Juvenile Probation Department, 13 are there African-American supervisors? 14 A. Yes. 15 Q. All right. So, presumably, these 16 individuals have passed the exam; is that right? 17 A. Yes. But there's a side part to that 18 as well. 19 Q. Why don't you give me the side part. 20 A. Sure. Having now endured the 21 discrimination that I have entailed, I went back 22 to some of these officers and asked them what 23 was their experience. And many of them used to 24 talk about how, even before my tenure, there</p>

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<p style="text-align: right;">154</p> <p>1 was, like, an open joke with African Americans</p> <p>2 taking the supervisor exam because you had</p> <p>3 back -- even back then, you had African</p> <p>4 Americans even with doctoral degrees and juris</p> <p>5 doctorates. One in particular, Charlie Calvin,</p> <p>6 who had a juris doctorate during the time that</p> <p>7 he supposedly failed the exam three, four times</p> <p>8 before finally passing.</p> <p>9 Q. Let's not put too much stock into the</p> <p>10 JD degree.</p> <p>11 A. Well, I'm just saying. It's a lot of</p> <p>12 money that goes into degrees like that.</p> <p>13 Q. I'm just kidding. I know. Okay.</p> <p>14 MR. GEOGHEGAN: We can stipulate to</p> <p>15 that.</p> <p>16 MR. HAYES: Yes, we can.</p> <p>17 THE WITNESS: And they mentioned the</p> <p>18 same thing, that many of them weren't allowed --</p> <p>19 none of them were allowed to see their tests.</p> <p>20 So it's been an --</p> <p>21 BY MR. HAYES:</p> <p>22 Q. Even the ones that passed, they don't</p> <p>23 get to see it? Is that your understanding?</p> <p>24 A. No. No. And respectively, there has</p>	<p style="text-align: right;">156</p> <p>1 Q. That's fine. Okay.</p> <p>2 Now, let's get back to the</p> <p>3 complaints. We'll continue down to Patrick</p> <p>4 Nelson because your attorney is right. Some of</p> <p>5 these do apply to you as well.</p> <p>6 So let's -- still on Page 19,</p> <p>7 Paragraph 69 and 68 through 72. If you want to</p> <p>8 take a look at that. I'll ask you some</p> <p>9 questions on this stuff as well.</p> <p>10 A. Where do you want me to stop?</p> <p>11 Q. Just read through -- just the Nelson</p> <p>12 section through 72. Up here, maybe.</p> <p>13 A. Okay.</p> <p>14 Q. Yeah. Okay.</p> <p>15 A. Okay.</p> <p>16 Q. All right. Go to Paragraph 68, first</p> <p>17 one under Mr. Nelson. Okay. The second</p> <p>18 sentence, "Both Plaintiffs, Nelson and Chapman,</p> <p>19 filed grievances with their union claiming that</p> <p>20 they were denied compensation for time spent</p> <p>21 doing job-related training out of state when</p> <p>22 white probation officers did receive</p> <p>23 compensation for similar out-of-state training.</p> <p>24 The grievances were denied by the Defendant."</p>
<p style="text-align: right;">155</p> <p>1 been some people along the way who have admitted</p> <p>2 that they didn't study and they passed, and many</p> <p>3 of them were whites.</p> <p>4 Q. Do you know any names of those?</p> <p>5 A. This is just when I was talking to</p> <p>6 them, asking them, trying to gauge some</p> <p>7 understanding about this.</p> <p>8 Q. Who were they?</p> <p>9 A. I don't know right -- recollect right</p> <p>10 now, but many of them are deputy chiefs now.</p> <p>11 One in particular, I think, was Virginia</p> <p>12 Caulfield, who many of them indicated, you know,</p> <p>13 she was like -- she used to come to work drunk.</p> <p>14 I don't know for sure but -- and they indicated</p> <p>15 she knew nothing about being a supervisor or --</p> <p>16 Q. She's white?</p> <p>17 A. She's white. Bill --</p> <p>18 Q. Sorry.</p> <p>19 But you don't have any</p> <p>20 firsthand knowledge of her test, exam or</p> <p>21 anything?</p> <p>22 A. This is me --</p> <p>23 Q. We don't need to get into that.</p> <p>24 A. Okay.</p>	<p style="text-align: right;">157</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. All right. What training is referred</p> <p>4 to here?</p> <p>5 A. There's a training -- when we were in</p> <p>6 Jumpstart, there was a training that took place</p> <p>7 in San Antonio. I believe it was in 2011. And</p> <p>8 it involved what the agency called COPA, and it</p> <p>9 was an advocacy group. It's counselors,</p> <p>10 attorneys, parents, principals, and advocates or</p> <p>11 something to that nature. And this is where the</p> <p>12 deputy chief at that time, Donna Neal, when she</p> <p>13 came in as our deputy, everything with me and</p> <p>14 Mr. Chapman was having to validate our position</p> <p>15 and to prove our worth.</p> <p>16 And so this is one of those</p> <p>17 situations where this was kind of forced upon</p> <p>18 us, that if we wanted to validate our position,</p> <p>19 we needed substantive trainings and so forth as</p> <p>20 though -- we always exceeded our training every</p> <p>21 year, but this training was kind of just pushed</p> <p>22 and pushed. And, again, we complied and</p> <p>23 attended --</p> <p>24 Q. And this was in 2011?</p>

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<p style="text-align: right;">158</p> <p>1 A. I believe it was 2011.</p> <p>2 MR. HAYES: Let's see if this helps.</p> <p>3 (WHEREUPON, Chapman Deposition</p> <p>4 Exhibit No. 2 was marked for</p> <p>5 identification.)</p> <p>6 THE WITNESS: Donna Neal was there in</p> <p>7 '13, '14. So maybe in 2014.</p> <p>8 MR. HAYES: This will help.</p> <p>9 THE WITNESS: Yeah. Okay.</p> <p>10 BY MR. HAYES:</p> <p>11 Q. You've been handed what's been marked</p> <p>12 Exhibit 2.</p> <p>13 A. Yeah.</p> <p>14 Q. Do you recognize this email?</p> <p>15 A. Yes.</p> <p>16 Q. All right. And it's from you,</p> <p>17 correct?</p> <p>18 A. No. It's to me.</p> <p>19 Q. Oh, sorry. You're right. To you,</p> <p>20 correct?</p> <p>21 A. Right.</p> <p>22 Q. And from Donna Neal?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And is this referring to the</p>	<p style="text-align: right;">160</p> <p>1 contest this.</p> <p>2 Q. Okay. All right. I think I got it</p> <p>3 now.</p> <p>4 A. Not a problem.</p> <p>5 Q. All right.</p> <p>6 So your allegation is that you</p> <p>7 received straight time and you should have</p> <p>8 received true compensatory time, which is 1.5,</p> <p>9 right?</p> <p>10 A. And not to mention, she even stated on</p> <p>11 here, where we were working on the weekends when</p> <p>12 our Collective Bargaining Agreement clearly</p> <p>13 states that any work on the weekends constitutes</p> <p>14 time and a half.</p> <p>15 Q. And then did you grieve -- strike</p> <p>16 that.</p> <p>17 Was this e-mail -- did this</p> <p>18 spur your grievance or did you grieve before</p> <p>19 this e-mail?</p> <p>20 A. It spurred the grievance.</p> <p>21 Q. All right.</p> <p>22 And so who attended this</p> <p>23 training; you and Mr. Nelson?</p> <p>24 A. Me and Mr. Nelson and -- it was</p>
<p style="text-align: right;">159</p> <p>1 training that you were just talking about?</p> <p>2 A. Yes.</p> <p>3 Q. And as you sit here, is this an</p> <p>4 accurate reflection of the compensatory time</p> <p>5 that you were awarded?</p> <p>6 A. No.</p> <p>7 Q. So you weren't awarded this</p> <p>8 compensatory time?</p> <p>9 A. This is what we call straight time.</p> <p>10 It wasn't compensatory. It was straight.</p> <p>11 Q. It does say "compensatory time at</p> <p>12 straight hourly time." Is that right?</p> <p>13 A. That's a -- that's word play, but it's</p> <p>14 actually --</p> <p>15 Q. Okay. I want to be clear on it.</p> <p>16 A. Yeah.</p> <p>17 Q. So you are awarded ten-and-a-half</p> <p>18 hours compensatory, but that would be an actual</p> <p>19 ten-and-a-half hours; is that right?</p> <p>20 A. Yes. That's time for time.</p> <p>21 Q. And are you saying you should have</p> <p>22 gotten time and a half?</p> <p>23 A. Yes. That's what the grievance came</p> <p>24 after because the grievance was for -- to</p>	<p style="text-align: right;">161</p> <p>1 some -- it was -- she was at the time sheets.</p> <p>2 She was deputy chief over Jumpstart.</p> <p>3 Q. Who is "she?" Ms. Neal?</p> <p>4 A. Deputy Chief Donna Neal. She was over</p> <p>5 at Jumpstart, educational advocacy and, I think,</p> <p>6 one other unit. And there was some -- some</p> <p>7 officers also from educational advocacy also</p> <p>8 that were on this trip, this training.</p> <p>9 Q. Okay.</p> <p>10 And do you know of anyone else</p> <p>11 who was on that specific trip, training trip,</p> <p>12 anyone specifically that received the 1.5</p> <p>13 compensatory time?</p> <p>14 A. I believe Carolyn Conway did receive</p> <p>15 hers because she's one of the individuals that</p> <p>16 indicated that -- after we found out later that</p> <p>17 they had went on previous trips because Carolyn</p> <p>18 was in education --</p> <p>19 See, before Jumpstart came</p> <p>20 under Donna Neal, there was an educational</p> <p>21 advocacy unit, and because Jumpstart dealt with</p> <p>22 education remediation, she absorbed us under her</p> <p>23 unit. So these trips were normal for</p> <p>24 educational advocacy to go on, which was</p>

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<p style="text-align: right;">162</p> <p>1 predominantly a white unit.</p> <p>2 And so now that we were under</p> <p>3 Donna Neal's -- DCPO Donna Neal's umbrella, she</p> <p>4 now was telling us in order to validate our</p> <p>5 position and so forth, basically to earn our</p> <p>6 worth, that we needed to attend these</p> <p>7 conferences. But what she didn't tell us is</p> <p>8 that previously before we were brought under her</p> <p>9 umbrella is that the officers that were in this</p> <p>10 advocacy unit, they received time and a half.</p> <p>11 Q. I'm not concerned about previously. I</p> <p>12 want to know this specific trip, San Antonio,</p> <p>13 March 2011.</p> <p>14 A. Okay.</p> <p>15 Q. Were there -- was there anyone else</p> <p>16 that came down with you and Mr. Nelson from JPD?</p> <p>17 Let's start with that.</p> <p>18 A. Yes.</p> <p>19 Q. All right.</p> <p>20 And are you specifically aware</p> <p>21 of any of those individuals receiving the</p> <p>22 compensatory time of 1.5 hours?</p> <p>23 A. To my knowledge, Carolyn Conway</p> <p>24 received her time and a half.</p>	<p style="text-align: right;">164</p> <p>1 on this trip had also went on previous trips and</p> <p>2 they were awarded their time and a half.</p> <p>3 Q. Okay. Did anyone who went on this</p> <p>4 trip specifically tell you that they got</p> <p>5 time-and-a-half compensatory time?</p> <p>6 A. No. But once I addressed it with the</p> <p>7 deputy -- with Donna -- with DCPO Donna Neal</p> <p>8 prior to filing a grievance, her response to me</p> <p>9 and Mr. Nelson is, what makes you think you</p> <p>10 should get what other people get, end quote.</p> <p>11 Q. Was that part of your grievance?</p> <p>12 A. This is what sparked the grievance.</p> <p>13 Q. Okay.</p> <p>14 A. The goal was not to file a grievance.</p> <p>15 The goal was to just get what we earned and what</p> <p>16 we rightfully were supposed to.</p> <p>17 Q. And then going back to Exhibit 2 here,</p> <p>18 did you get the 10-and-a-half hours and the</p> <p>19 13-and-a-half hours straight time?</p> <p>20 A. This we did receive. Yes.</p> <p>21 Q. So what you're missing out was the</p> <p>22 times that times .5?</p> <p>23 A. Yes.</p> <p>24 Q. Okay.</p>
<p style="text-align: right;">163</p> <p>1 Q. And what was her position at that</p> <p>2 time?</p> <p>3 A. She was an educational advocate.</p> <p>4 Q. Anyone else?</p> <p>5 A. That's just to my knowledge.</p> <p>6 Q. All right.</p> <p>7 A. Prior to that --</p> <p>8 Q. Her race?</p> <p>9 A. She's white. She's Caucasian.</p> <p>10 Q. Were there any other white -- let's</p> <p>11 say non-African American individuals that went</p> <p>12 on this specific trip with you?</p> <p>13 A. There was some Latino officers also</p> <p>14 that were in educational advocacy. And to my</p> <p>15 knowledge they also -- I believe they received</p> <p>16 time and a half.</p> <p>17 Q. What's the basis of your knowledge of</p> <p>18 that?</p> <p>19 A. After speaking with Officer Rick</p> <p>20 Tekip, who also was in educational advocacy,</p> <p>21 kind of referenced that it was standard to get</p> <p>22 time and a half on these trips.</p> <p>23 Q. Okay.</p> <p>24 A. And the individuals that went with us</p>	<p style="text-align: right;">165</p> <p>1 Going back to the complaint</p> <p>2 here, the job-related training. Is there any</p> <p>3 other training that you were referring to or is</p> <p>4 it just this specific 2011 training where you</p> <p>5 didn't get the proper payment?</p> <p>6 A. This was -- this was one of the --</p> <p>7 this was the major one right here where we</p> <p>8 actually did all this work and didn't get the</p> <p>9 pay for it.</p> <p>10 Q. Were there any other ones?</p> <p>11 A. Any other trainings?</p> <p>12 Q. Trainings.</p> <p>13 A. No. No.</p> <p>14 Q. Okay.</p> <p>15 A. Oh, yeah. There was one other</p> <p>16 instance.</p> <p>17 Q. Sure.</p> <p>18 A. We had a minor in Jumpstart who, when</p> <p>19 he first came to us, he had a plethora of</p> <p>20 issues. Not only did we get the minor reading</p> <p>21 sustainably, his comprehension level increased</p> <p>22 to the point where the minor not only went on to</p> <p>23 get his GED but he also got a Project Lifeline</p> <p>24 Scholarship, which is awarded to those minors</p>

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<p style="text-align: right;">166</p> <p>1 that were former wards of the court who went on 2 to get their high school diplomas and can enroll 3 in whatever high -- college or junior college or 4 trade program. Not only did he successfully get 5 his associate's degree but he went on to receive 6 what was called the BARJ award, Balance and 7 Restorative Justice. 8 And in my work with the minor 9 and helping him compose his letter, taking him 10 to, you know, get a suit -- because this is a 11 prestigious award given by the judges -- my 12 supervisor was aware of the extra time that I 13 was gonna devote, as was Mr. Nelson, in 14 preparing this minor for this momentous 15 occasion. 16 But after we had did the work, 17 DCPO Donna Neal contested it and denied the time 18 that was supposedly allotted to help this minor 19 prepare for this -- this award. 20 Q. That wasn't a training, was it? 21 A. No. 22 Q. I know. It's fine. 23 A. It was my first time -- well, training 24 in the sense of -- yes -- no. This was</p>	<p style="text-align: right;">168</p> <p>1 So the allegations in the 2 complaint from 69 through 71 it's -- even though 3 it's under Mr. Nelson, they apply to you as 4 well; is that correct? 5 A. Correct. 6 Q. All right. 7 So let's start with 69. "In 8 2015, the Cook County Juvenile Probation 9 Department eliminated positions occupied by 10 Nelson and Chapman in the 'Jumpstart' program 11 under guise of reorganization." 12 All right. So tell me what 13 happened to the Jumpstart program in 2015. 14 A. Sure. 2015 Deputy Chief Dennis 15 Alexander came in at the helm asking Nelson and 16 myself to assist him in working to revamp, in 17 some cases, some areas where they can possibly 18 draw some improvements to continue on those -- 19 those successes that we already were having with 20 the minors. He asked us to kind of put aside 21 the way we have been treated in an attempt to, 22 let's see what we can do for the kids because, 23 you know, he knew we were big advocates for 24 the kids --</p>
<p style="text-align: right;">167</p> <p>1 my first. 2 Q. All right. What I want to focus on -- 3 just because I want to make sure we get 4 everything that you're alleging in the complaint 5 out today. This is my shot. 6 A. Got you. 7 Q. Okay. So was there any other 8 trainings that you -- that you are alleging that 9 you feel -- that you believe you were not 10 properly compensated for while working at JPD? 11 A. I would say this is the one that -- 12 this -- 13 Q. When you say "this is the one," you 14 mean Exhibit 2, right, that training in 2011? 15 A. Yes. Yes. 16 Q. And just for the record -- it drives 17 me crazy when I review my transcripts and I 18 don't have this in there, but it's Bates 19 Defendant's 2008. 20 Now, we're going to get -- the 21 next three paragraphs are actually pretty -- you 22 know, all relate to the Jumpstart 23 reorganization, whatever. So I want to ask you 24 some questions on that.</p>	<p style="text-align: right;">169</p> <p>1 Q. Just to be clear, I just want to -- 2 A. Yes. 3 Q. I might interrupt you a few times. 4 A. That's fine. 5 Q. I want to clear up some things. 6 Alexander, he's after Donna Neal, right? 7 That same position but he took 8 her -- 9 A. Yes. 10 Q. Okay. Go ahead. 11 A. And so after Donna Neal came, then 12 there was DCPO Spooner. She did so many changes 13 that it actually -- it was counter-productive. 14 So when DCPO Alexander came 15 in, he wanted to try to correct some of those 16 things without saying it was her fault, but he 17 just wanted to correct some things and kind of 18 put the ship back afloat, and we were on board 19 because we're team players. 20 And so with that, he asked us 21 to lean on our relationships with officers that 22 we had previous relationships with. So not only 23 did we go out office to office, you know, notify 24 --</p>

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<p style="text-align: right;">170</p> <p>1 Q. When you say "we," who are you</p> <p>2 referring to?</p> <p>3 A. Patrick Nelson.</p> <p>4 Q. Just the two of you?</p> <p>5 A. We would actually go out and --</p> <p>6 Q. I'm sorry. Was there anyone else?</p> <p>7 MR. GEOGHEGAN: Just -- you've got a</p> <p>8 question. But you're kind of interrupting him,</p> <p>9 and it's getting a little confusing.</p> <p>10 MR. HAYES: I know. He's giving a</p> <p>11 narrative, and I understand why he has to, but</p> <p>12 I'm just trying to take on the steer of the ship</p> <p>13 a little bit here.</p> <p>14 THE WITNESS: We were asked to kind of</p> <p>15 take the lead on this because we were the most</p> <p>16 tenured officers in the program.</p> <p>17 BY MR. HAYES:</p> <p>18 Q. All right. By Deputy Chief Alexander?</p> <p>19 A. Alexander, yes.</p> <p>20 Q. So this was in 2015?</p> <p>21 A. Yes.</p> <p>22 Q. All right. So -- and I just want to</p> <p>23 clarify. Who is in the Jumpstart program? Who</p> <p>24 was working in the Jumpstart program?</p>	<p style="text-align: right;">172</p> <p>1 Ms. Jackson involved in this as well?</p> <p>2 A. Ms. Jackson, her role was more so</p> <p>3 reduced to just the classroom component where</p> <p>4 she would -- she would just teach a little bit</p> <p>5 of -- maybe -- it may have been a little bit of</p> <p>6 math. But for the most part, me and Nelson</p> <p>7 taught everything anyway.</p> <p>8 Q. And at this time, 2015, how many</p> <p>9 minors were enrolled in the program?</p> <p>10 A. Anywhere from -- again, it varied.</p> <p>11 You know, we had three -- we had four cycles --</p> <p>12 five cycles now because we were doing it now</p> <p>13 every eight weeks as opposed to twelve weeks.</p> <p>14 And the time in between each cycle now was much</p> <p>15 shorter. So there was a smaller time to prepare</p> <p>16 for the next group. And eventually it would be</p> <p>17 ongoing. Kids would be coming in -- dropped --</p> <p>18 it was like a drop-in program. So there was no</p> <p>19 set beginning and no set ending.</p> <p>20 Q. Approximately how many?</p> <p>21 A. Anywhere from -- anywhere from 15 to</p> <p>22 25.</p> <p>23 Q. All right.</p> <p>24 A. 15 to 28. 15 to 30.</p>
<p style="text-align: right;">171</p> <p>1 A. Nelson, myself, and Tatanesha Jackson.</p> <p>2 Q. Okay.</p> <p>3 A. And there was one outreach officer,</p> <p>4 Yusef Harris. Officer Vincent Samuel was now in</p> <p>5 a pilot program called Sanctions, which is like</p> <p>6 a two-hour-a-day program where the minors are</p> <p>7 just, like, shown prison videos. And they're</p> <p>8 given snacks because they may be suspended from</p> <p>9 school and then they're released to go home.</p> <p>10 Q. All right.</p> <p>11 So 2015 Alexander comes in and</p> <p>12 wants to revamp things and you and Mr. Nelson go</p> <p>13 out and -- is it outreach that you're doing at</p> <p>14 that point?</p> <p>15 A. We're doing everything. We're doing</p> <p>16 instructors -- we are instructors. We're doing</p> <p>17 outreach because there was only one outreach</p> <p>18 officer now. We're doing tutoring. We're doing</p> <p>19 mentoring. We are also doing -- at this point</p> <p>20 now we are still doing a little bit of advocacy</p> <p>21 work, enrolling the minors in school. So we're</p> <p>22 pretty much doing it all.</p> <p>23 Q. All right.</p> <p>24 Just the two of you or is</p>	<p style="text-align: right;">173</p> <p>1 Q. All right.</p> <p>2 A. Now, mind you, at 15 might not be the</p> <p>3 Catholic schoolboy 15. We're talking about 15</p> <p>4 gangbangers, you know.</p> <p>5 Q. I hear you.</p> <p>6 A. The intensity of those 15 far</p> <p>7 outweighed the number of 15 kids. Because one</p> <p>8 kid might require the attention that three kids</p> <p>9 would normally require.</p> <p>10 Q. Well, what I want to focus on is the</p> <p>11 allegation here when the JPD eliminated the</p> <p>12 positions.</p> <p>13 A. Okay.</p> <p>14 Q. So tell -- when were your positions</p> <p>15 eliminated? Let's start there.</p> <p>16 A. November 2015 we were officially</p> <p>17 removed.</p> <p>18 Q. All right. All right.</p> <p>19 When you say "we," I just want</p> <p>20 to know --</p> <p>21 A. Patrick Nelson and myself.</p> <p>22 Q. Okay.</p> <p>23 A. Patrick Nelson and myself. Theodis</p> <p>24 Chapman. We were officially removed.</p>

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<p style="text-align: right;">174</p> <p>1 Q. Okay. Was -- what about Ms. Jackson?</p> <p>2 A. No. Ms. Jackson was allowed to stay.</p> <p>3 Q. Did -- November 2015 she was allowed</p> <p>4 to stay. Did her job duties change at all, to</p> <p>5 your knowledge?</p> <p>6 A. No. We were -- actually we --</p> <p>7 actually, Mr. Nelson and myself had more -- not</p> <p>8 only did we have seniority, we had -- not</p> <p>9 only --</p> <p>10 Go ahead. What's your</p> <p>11 question?</p> <p>12 Q. No. I was saying you're not answering</p> <p>13 the question.</p> <p>14 A. All right.</p> <p>15 MR. GEOGHEGAN: Can I make a</p> <p>16 suggestion?</p> <p>17 MR. HAYES: Yeah.</p> <p>18 MR. GEOGHEGAN: Maybe we can take a</p> <p>19 break for about five minutes.</p> <p>20 MR. HAYES: Yeah. That's fine. We</p> <p>21 can do that. Yeah.</p> <p>22 (WHEREUPON, a discussion</p> <p>23 was held off the record.)</p> <p>24</p>	<p style="text-align: right;">176</p> <p>1 positions were eliminated. Were your positions</p> <p>2 eliminated?</p> <p>3 A. Based -- that's what they told us.</p> <p>4 Yes. That's what they told us. Yes.</p> <p>5 Q. Okay.</p> <p>6 After November 2015 did</p> <p>7 Jumpstart continue to operate?</p> <p>8 A. Yes.</p> <p>9 Q. All right. In the exact same way it</p> <p>10 had prior to November 2015?</p> <p>11 A. No.</p> <p>12 Q. All right. And how was it different?</p> <p>13 A. There's -- how are they doing it now?</p> <p>14 Q. Well, let's put it this way. Is there</p> <p>15 still a program called Jumpstart at JPD?</p> <p>16 A. Yes.</p> <p>17 Q. All right.</p> <p>18 Is there still on-site</p> <p>19 classroom instruction of Jumpstart at JPD?</p> <p>20 A. I don't know.</p> <p>21 Q. Do you know who currently works in the</p> <p>22 Jumpstart program?</p> <p>23 A. Yes.</p> <p>24 Q. Who?</p>
<p style="text-align: right;">175</p> <p>1 BY MR. HAYES:</p> <p>2 Q. Mr. Chapman, I just want to clarify my</p> <p>3 last question.</p> <p>4 A. Okay.</p> <p>5 Q. November 2015, when you and Mr. Nelson</p> <p>6 were removed from Jumpstart, Ms. Jackson stayed;</p> <p>7 is that right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Did her duties change in any</p> <p>10 way from before November 2015 until after 2015,</p> <p>11 to your knowledge?</p> <p>12 A. To my knowledge, I'm not sure.</p> <p>13 Q. Okay.</p> <p>14 After November 2015 do you</p> <p>15 know if Ms. Jackson was still doing classroom</p> <p>16 instruction at Jumpstart?</p> <p>17 A. I'm not sure.</p> <p>18 Q. After November of 2015 was anyone put</p> <p>19 into yours or Mr. Nelson's positions in</p> <p>20 Jumpstart?</p> <p>21 A. Yes.</p> <p>22 Q. All right. And who was that?</p> <p>23 A. Dale Lomax and Dan O'Connell.</p> <p>24 Q. Okay. So Paragraph 69 says the</p>	<p style="text-align: right;">177</p> <p>1 A. Tatanesha Jackson, Dale Lomax, Dan</p> <p>2 O'Connell, Yusef Harris.</p> <p>3 Q. Who's the last one?</p> <p>4 A. Yusef Harris.</p> <p>5 Q. Okay. And I don't think we've heard</p> <p>6 that one before. What's his race?</p> <p>7 A. African American.</p> <p>8 Q. All right.</p> <p>9 So back to Paragraph 69. It</p> <p>10 says you were eliminated -- sorry. I'll just</p> <p>11 read it again.</p> <p>12 "In 2015, the Cook County</p> <p>13 Juvenile Probation Department eliminated</p> <p>14 positions occupied by Nelson and Chapman in the</p> <p>15 'Jumpstart' program under guise of</p> <p>16 reorganization."</p> <p>17 Is that right? That's what</p> <p>18 that says, right?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. To your knowledge -- let's</p> <p>21 start with the first question.</p> <p>22 You were told that it was a</p> <p>23 reorganization; is that right?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">178</p> <p>1 Q. All right. And who told you that?</p> <p>2 A. During labor -- Avik Das.</p> <p>3 Q. And as you're sitting here now, do you</p> <p>4 believe that the Jumpstart program was</p> <p>5 reorganized in any way?</p> <p>6 MR. GEOGHEGAN: Technically or in a</p> <p>7 good faith manner?</p> <p>8 THE WITNESS: That's what I'm saying.</p> <p>9 MR. HAYES: I want to say technically.</p> <p>10 THE WITNESS: No.</p> <p>11 BY MR. HAYES:</p> <p>12 Q. All right.</p> <p>13 And do you know what current</p> <p>14 position, job title of Mr. Lomax and</p> <p>15 Mr. O'Connell is?</p> <p>16 A. Jumpstart -- Jumpstart advocacy --</p> <p>17 Jumpstart educational advocacy is one of the</p> <p>18 components that we did. When -- if I may?</p> <p>19 Q. Yeah. Go ahead.</p> <p>20 A. When the program, as I mentioned, with</p> <p>21 Mr. Alexander and subsequently DCPO Johnson took</p> <p>22 over after Alexander and the program was adding</p> <p>23 all these other duties, that was one of them,</p> <p>24 educational advocacy.</p>	<p style="text-align: right;">180</p> <p>1 A. Yes.</p> <p>2 Q. All right. Did you want one of these</p> <p>3 educational advocate positions?</p> <p>4 A. Yes.</p> <p>5 Q. All right. So you wanted one of the</p> <p>6 positions that Mr. Lomax and Mr. O'Connell has;</p> <p>7 is that right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Which they still hold?</p> <p>10 A. Yes.</p> <p>11 Q. All right. Did you bid for those</p> <p>12 positions?</p> <p>13 A. There was no bid.</p> <p>14 Q. There's no bid.</p> <p>15 Do you know when those two,</p> <p>16 Mr. Lomax or Mr. O'Connell, were put into those</p> <p>17 positions?</p> <p>18 A. Mr. Lomax was put in there before me</p> <p>19 and Nelson -- well, his name appeared on the</p> <p>20 sign-in sheet. He was put in as me and Nelson</p> <p>21 were being removed.</p> <p>22 Q. All right. So around November of</p> <p>23 2015?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">179</p> <p>1 Q. And what does that mean?</p> <p>2 A. Reenrolling the minors back in school.</p> <p>3 Q. At regular schools or charter schools</p> <p>4 even?</p> <p>5 A. Whichever one.</p> <p>6 Q. Okay.</p> <p>7 A. Finding the best fit.</p> <p>8 Q. Okay. Let's go to Paragraph 70, which</p> <p>9 is the next page.</p> <p>10 All right. It says, "Rather</p> <p>11 than allow them to exercise their seniority and</p> <p>12 be reassigned to other positions within the</p> <p>13 Jumpstart program, the Cook County Juvenile</p> <p>14 Probation Department moved Nelson and Chapman to</p> <p>15 a field position, outside their experience</p> <p>16 within the Jumpstart program and without</p> <p>17 adequate training, in gross derogation of</p> <p>18 established standards."</p> <p>19 Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. All right. So let's talk about the</p> <p>22 first part here talking about reassignment. In</p> <p>23 November 2015 did you want to remain in</p> <p>24 Jumpstart?</p>	<p style="text-align: right;">181</p> <p>1 Q. All right. Mr. O'Connell, do you know</p> <p>2 when that happened?</p> <p>3 A. Mr. O'Connell just came in about,</p> <p>4 maybe -- he told me in court one day. I believe</p> <p>5 may have been six, eight months ago.</p> <p>6 Q. Okay.</p> <p>7 A. Actually, that's how I found out he</p> <p>8 was in there.</p> <p>9 Q. Who did you tell you wanted to</p> <p>10 reassign to that -- who did -- sorry.</p> <p>11 Who did you tell you wanted to</p> <p>12 be reassigned to another position within</p> <p>13 Jumpstart?</p> <p>14 A. Avik Das, William Patterson, Donna</p> <p>15 Neal, Mark Warner, Jennifer Nunez, all DCPOs.</p> <p>16 They were at labor management.</p> <p>17 Q. Okay.</p> <p>18 A. I even addressed Avik Das directly.</p> <p>19 Q. In person or in writing?</p> <p>20 A. Person and in writing. The union</p> <p>21 forwarded it also in writing. It was even asked</p> <p>22 that he could reconsider, considering our</p> <p>23 seniority, the fact that we had been in the</p> <p>24 position --</p>

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<p style="text-align: right;">182</p> <p>1 Q. So these other Jumpstart positions, 2 there was never a bid for them? 3 A. No. If I may? 4 Q. Sure. 5 A. That's where the grievance also was 6 filed in regards to management doctoring the bid 7 list to look as though Jumpstart was divided up 8 into these separate units when, in fact, it was 9 one unit. They give the impression, according 10 to the bid list, as though there was this 11 separate instructional Jumpstart. It's 12 Jumpstart outreach and Jumpstart advocacy when 13 it was all one unit. 14 Q. Yeah. Who did that? Who -- 15 A. Management. 16 Q. Management. 17 A. Yes. Because we had a copy -- the 18 union had a copy of the bid list before Nelson 19 and I was all of a sudden targeted and 20 discriminately removed. And then they had a 21 copy of the bid list after it was tampered. 22 Q. Wait. Wait. Let me -- sorry. What 23 was -- the bid list was tampered? 24 A. The bid list was tampered and</p>	<p style="text-align: right;">184</p> <p>1 Q. Were there open positions on that bid 2 list? 3 A. Not to my knowledge. If so, I would 4 have bid. 5 Q. So let me ask you this way. On this 6 time period, October/November of 2015, were 7 there any other positions in Jumpstart that you 8 could have bid on? 9 A. Yes. 10 Q. All right. And what were those? 11 A. Every position in Jumpstart. I was 12 already doing the job. Outreach, I was doing -- 13 Q. Maybe I didn't ask that right. 14 A. Okay. Reask it. 15 Q. I'm sorry. 16 During this time period, two 17 thousand -- October or November 2015 -- 18 A. 2015. 19 Q. Yeah. 20 -- were there other positions 21 in Jumpstart that were available to be bid on? 22 A. Not to my -- 23 MR. GEOGHEGAN: I'm not sure I 24 understand the question.</p>
<p style="text-align: right;">183</p> <p>1 redesigned to look like Jumpstart specifically 2 was these three separate units. 3 Q. I see. Okay. 4 A. When, in fact, it's one unit. 5 Q. All right. Who changed this bid list, 6 to your knowledge? 7 A. Management is the only one that 8 actually puts the bid list together. 9 Q. And when did that happen? 10 A. This happened, like, right before -- 11 it had to be, like, November -- late October, 12 November. 13 Q. Of '15? 14 A. '15, yes. 15 Q. All right. 16 So were -- was there a bid 17 list for these other positions or no? 18 A. No. 19 Q. There wasn't? 20 A. There was no list. 21 Q. What was on this tampered bid list? 22 A. It just -- it made Jumpstart look like 23 it was three different units, like it was an EM, 24 an IPS. It was --</p>	<p style="text-align: right;">185</p> <p>1 MR. HAYES: Yeah. I'm having a hard 2 time with this, too. 3 THE WITNESS: Can I give you some 4 clarification? 5 MR. HAYES: Sure. Yeah. That would 6 be great. That would be great. 7 THE WITNESS: Okay? 8 MR. GEOGHEGAN: Sure. 9 THE WITNESS: Yeah. Yeah. Nelson and 10 I were already doing every job there was 11 possibly to be had in Jumpstart, from outreach, 12 advocacy, instruction. We were doing all the 13 jobs because -- 14 MR. HAYES: Well -- 15 MR. GEOGHEGAN: Let him finish. 16 MR. HAYES: Well, I'm just trying to 17 clarify as he goes along. 18 MR. GEOGHEGAN: If that helps. If 19 that helps. 20 MR. HAYES: Yeah. I know. I don't 21 mean to cut him off. 22 MR. GEOGHEGAN: No, no, no. Go ahead. 23 MR. HAYES: I'm just trying to get 24 clarification as we go along.</p>

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<p style="text-align: right;">186</p> <p>1 BY MR. HAYES:</p> <p>2 Q. Was it your understanding then that --</p> <p>3 that -- that this tampered bid list was to</p> <p>4 separate out your job duties, your and</p> <p>5 Mr. Nelson's job duties?</p> <p>6 A. This was just part of the</p> <p>7 discrimination, as far as Mr. Nelson and myself.</p> <p>8 Q. I understand that. Okay. That's</p> <p>9 fine. That's fine.</p> <p>10 Were you ever given a reason</p> <p>11 why Jumpstart was being reorganized?</p> <p>12 A. Operational need.</p> <p>13 Q. That's all they said?</p> <p>14 A. That's all they said.</p> <p>15 Q. All right. And who said that to you?</p> <p>16 A. Avik Das.</p> <p>17 Q. There's no other explanation?</p> <p>18 A. No. And he didn't have to expound on</p> <p>19 that, he said.</p> <p>20 Q. He actually said that?</p> <p>21 A. He said, I don't have to -- in his</p> <p>22 words, I don't have to give it reason. Just</p> <p>23 note that it's operational need and management</p> <p>24 reserves the right.</p>	<p style="text-align: right;">188</p> <p>1 Q. How does that -- explain what a bid</p> <p>2 is.</p> <p>3 A. For example -- and I will try to keep</p> <p>4 it --</p> <p>5 Q. Please.</p> <p>6 A. -- brief. IPS probably has one of the</p> <p>7 highest bid lists. There's almost always at</p> <p>8 least 20 people with a bid in for IPS.</p> <p>9 Q. What's IPS?</p> <p>10 A. Intensive Probation Services.</p> <p>11 Q. Okay.</p> <p>12 A. If you're way down on the list of</p> <p>13 seniority, it will be maybe years before you</p> <p>14 even think about getting in there.</p> <p>15 There was never any bids in</p> <p>16 Jumpstart. Jumpstart always has been pretty</p> <p>17 much -- because you're in closed settings with</p> <p>18 the kids and most officers don't like to be in</p> <p>19 closed settings. That's why it took a</p> <p>20 particular skill set to work with this type of</p> <p>21 group because you are not able to go out and</p> <p>22 come and go. You're in there with them until</p> <p>23 the time they get there until the time they</p> <p>24 leave. So there was never a lot of bidding to</p>
<p style="text-align: right;">187</p> <p>1 Q. Okay.</p> <p>2 A. Something to that nature.</p> <p>3 Q. Yeah. Well, what I'm trying to get at</p> <p>4 here is that -- maybe I just don't understand</p> <p>5 the process. But I -- and I understand your</p> <p>6 position that you were doing all job duties.</p> <p>7 A. That's right.</p> <p>8 Q. At this time was there ever a bid list</p> <p>9 put up for any position in Jumpstart?</p> <p>10 A. No. No.</p> <p>11 Q. All right.</p> <p>12 A. No. There was never a posting for an</p> <p>13 opening in Jumpstart.</p> <p>14 Q. All right.</p> <p>15 A. You could bid on whatever unit you</p> <p>16 want, but that doesn't necessarily mean that</p> <p>17 there's an opening.</p> <p>18 Q. Oh, I see. Okay. Now that clarifies</p> <p>19 it a little bit.</p> <p>20 A. Okay.</p> <p>21 Q. So there doesn't have to be an opening</p> <p>22 for someone to bid on another position?</p> <p>23 A. No. You can bid. You can waste your</p> <p>24 bid however --</p>	<p style="text-align: right;">189</p> <p>1 get into Jumpstart. So our bid list was always</p> <p>2 empty. It was always --</p> <p>3 Q. I see.</p> <p>4 A. Yes.</p> <p>5 Q. And that process, is that outlined in</p> <p>6 the CBA?</p> <p>7 A. Yes.</p> <p>8 Q. And it goes by seniority?</p> <p>9 A. Seniority, yes.</p> <p>10 Q. All right.</p> <p>11 And as you say in the</p> <p>12 complaint, you had more seniority than the other</p> <p>13 two, Mr. Lomax and Mr. O'Connell?</p> <p>14 A. Oh, yes. Mr. Lomax just came out of</p> <p>15 training.</p> <p>16 Q. Okay.</p> <p>17 A. Not Mr. O'Connell. But Tatanesha</p> <p>18 Jackson, she had just came out of the field</p> <p>19 unit. She was still new, three years.</p> <p>20 So when they cited operational</p> <p>21 need, she had just came out of the field. Lomax</p> <p>22 just came out of training. Nelson and I had</p> <p>23 never been in a field unit.</p> <p>24</p>

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<p style="text-align: right;">190</p> <p>1 (WHEREUPON, Chapman Deposition 2 Exhibit No. 3 was marked for 3 identification.) 4 BY MR. HAYES: 5 Q. Okay. You have been handed what's 6 been marked as Exhibit 3. For the record, 7 that's Defendant's 002035. 8 Do you recognize this 9 document, Mr. Chapman? 10 A. Yes. 11 Q. All right. What is it? 12 A. It's my grievance for being removed in 13 violation of my seniority. 14 Q. And is this -- 15 A. And -- 16 Q. Go ahead. 17 A. -- treated in a discriminatory manner. 18 Q. All right. 19 And is this the grievance that 20 you filed after you were reassigned away from 21 Jumpstart? 22 A. Yes. 23 Q. All right. And what happened with 24 this grievance procedurally?</p>	<p style="text-align: right;">192</p> <p>1 BY MR. HAYES: 2 Q. Mr. Chapman, you have been handed 3 Exhibit 5. This is Defendant's 2031 through 4 2032, and it is to Mr. Smith. It's not to you, 5 so I was wondering if you had seen this before. 6 A. I have seen this. It's been a while. 7 Q. And then RE it says, "Step 4 Grievance 8 Response -- P.O. Theodis Chapman & P.O. Patrick 9 Nelson." 10 Do you see that? 11 A. Yes. 12 Q. Yeah. And you can look through this 13 if you want, but it's your understanding that 14 this is the Step 4 response to your grievance, 15 which we have been talking about? 16 A. Yes. Yes. 17 Q. All right. 18 And is it a normal procedure 19 to give the Step 4 grievance response to the 20 president of the union? Looking at the top, it 21 says it's to Jason Smith. 22 A. Yeah. I mean, from what I understand, 23 they can -- this is where protocols and 24 standards --</p>
<p style="text-align: right;">191</p> <p>1 A. I went through the steps all the way 2 to Step 2, 3, 4, to the Chief Judge's level. 3 And, you know, we're just waiting now on an 4 arbitration date. 5 MR. HAYES: Okay. 6 (WHEREUPON, Chapman Deposition 7 Exhibit No. 4 was marked for 8 identification.) 9 BY MR. HAYES: 10 Q. Okay. Look at what's been marked as 11 Exhibit 4, and that is Defendant's 002033 to 34. 12 Do you recognize this 13 document? 14 A. Yes. 15 Q. All right. And what is this? 16 A. This is their grievance response. 17 Q. All right. And what step is this? 18 A. Step 3. 19 Q. And who is this from? 20 A. Avik Das. 21 MR. HAYES: All right. 22 (WHEREUPON, Chapman Deposition 23 Exhibit No. 5 was marked for 24 identification.)</p>	<p style="text-align: right;">193</p> <p>1 Q. Okay. 2 A. Some things apply differently to some 3 people. 4 Q. And were you at the Step 4 grievance 5 here? 6 A. Yes. 7 Q. And it says it's from Kate Galbraith, 8 Counsel, Office of the Chief Judge. Do you see 9 that? 10 A. Yes. 11 Q. All right. 12 And is that what you mean 13 before when you say, like, the Chief Judge's? 14 A. Yes. This is the Step 4. 15 Q. Yes. 16 A. Designee. Which used to be Keith. So 17 Kate is also on board now. 18 Q. All right. 19 And the Chief Judge was not 20 there, right? 21 A. No. 22 Q. All right. 23 A. Whether he was in the building or -- I 24 don't know.</p>

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<p style="text-align: right;">194</p> <p>1 Q. He wasn't in your actual hearing</p> <p>2 meeting?</p> <p>3 A. No. No.</p> <p>4 Q. All right.</p> <p>5 And then the Step 4 was</p> <p>6 denied; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. And then after that you took it to</p> <p>9 arbitration?</p> <p>10 A. It's waiting -- pending an arbitration</p> <p>11 date.</p> <p>12 Q. Oh, pending. Oh, you haven't had it</p> <p>13 yet?</p> <p>14 A. Not yet.</p> <p>15 Q. All right.</p> <p>16 A. They're -- they're almost always</p> <p>17 denied at Step 4.</p> <p>18 Q. All right.</p> <p>19 A. That's the discrimination we are</p> <p>20 citing.</p> <p>21 (WHEREUPON, Chapman Deposition</p> <p>22 Exhibit No. 6 was marked for</p> <p>23 identification.)</p> <p>24</p>	<p style="text-align: right;">196</p> <p>1 It says, "Movement Outline."</p> <p>2 Do you see that under RE at the top?</p> <p>3 "Preliminary Proposal for Movement Outline for</p> <p>4 mid-August." Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. If you know, "movement outline," is</p> <p>7 that -- is that what the -- is that referring to</p> <p>8 the reorganization that we're talking about?</p> <p>9 A. Correct.</p> <p>10 Q. All right.</p> <p>11 A. That has many, many terms. Movement</p> <p>12 outline can be reorganized and it could be</p> <p>13 operational need. It could also be</p> <p>14 discrimination.</p> <p>15 Q. All right.</p> <p>16 Is there -- this looks like --</p> <p>17 actually, it's kind of confusing to me because</p> <p>18 there's a lot of acronyms. Is there anywhere on</p> <p>19 this sheet of paper that says you and</p> <p>20 Mr. Nelson's positions were being either</p> <p>21 eliminated or you were going to be reassigned?</p> <p>22 Anything like that?</p> <p>23 A. Just No. 2 at the bottom. "Reserve</p> <p>24 for reassignment as of yet to be determined, the</p>
<p style="text-align: right;">195</p> <p>1 BY MR. HAYES:</p> <p>2 Q. Mr. Chapman, you have been handed</p> <p>3 what's been marked as Exhibit 6. It's Defendant</p> <p>4 2149.</p> <p>5 Have you seen this document</p> <p>6 before?</p> <p>7 A. Yes.</p> <p>8 Q. All right. And can you tell me what</p> <p>9 this is?</p> <p>10 A. This was during the labor management</p> <p>11 meetings where the so-called movement or</p> <p>12 proposed movement was being outlined.</p> <p>13 Q. All right. And the date is July 21,</p> <p>14 2015?</p> <p>15 A. Yes.</p> <p>16 Q. You see that, right?</p> <p>17 Were you involved in these</p> <p>18 discussions in any way at this time?</p> <p>19 A. Yes. I was on the labor management.</p> <p>20 Q. So at the top it says, "AFSCME Local</p> <p>21 3477 Labor Management Team." And you were on</p> <p>22 that?</p> <p>23 A. Yes.</p> <p>24 Q. All right.</p>	<p style="text-align: right;">197</p> <p>1 two remaining Jumpstart traditional/instructor</p> <p>2 PO's."</p> <p>3 Q. All right. So that's you and</p> <p>4 Mr. Nelson?</p> <p>5 A. Correct.</p> <p>6 Q. All right.</p> <p>7 So what was your understanding</p> <p>8 at this time of what was going to happen to you</p> <p>9 based on No. 2 here?</p> <p>10 A. That we would still remain in</p> <p>11 Jumpstart, that whatever they configured it to</p> <p>12 be, considering we were the two more senior</p> <p>13 officers there, that we were probably in the</p> <p>14 best position to help move whatever goals they</p> <p>15 wanted to achieve forward.</p> <p>16 Q. Now, the first -- the first sentence</p> <p>17 says, "Management offers the following for</p> <p>18 consideration with regards to the reassignment</p> <p>19 of some employees who are bargaining unit</p> <p>20 members of AFSCME Local 3477."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. All right.</p> <p>24 What is your understanding --</p>

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<p style="text-align: right;">198</p> <p>1 I guess what I'm trying to figure out is --</p> <p>2 Well, why was this being</p> <p>3 submitted for consideration? What is the</p> <p>4 process here that this is part of?</p> <p>5 A. Management is supposed to negotiate</p> <p>6 whenever they have to do reassigning or</p> <p>7 redeploying officers to different parts of the</p> <p>8 department, whatever the case may be. They're</p> <p>9 supposed to bargain and negotiate with the union</p> <p>10 in good faith to see -- so that they don't</p> <p>11 violate seniority, so that they don't commit any</p> <p>12 discriminatory acts, so that they actually do it</p> <p>13 right. But -- go ahead.</p> <p>14 Q. Okay.</p> <p>15 So would you have been</p> <p>16 involved -- as part of the labor management</p> <p>17 team, would you have been involved in, like,</p> <p>18 this reorganization if it involved a different</p> <p>19 department or different unit?</p> <p>20 A. Rephrase your question.</p> <p>21 Q. Yeah. What I'm trying to get at is,</p> <p>22 would you -- as part of the labor management</p> <p>23 team, would you -- at this time would you be</p> <p>24 involved in a reorganization like this if it</p>	<p style="text-align: right;">200</p> <p>1 discriminatory means, they had did it before,</p> <p>2 and it kind of was working in this.</p> <p>3 Q. Well, I guess I want to know more</p> <p>4 specifically just for Jumpstart.</p> <p>5 A. Sure.</p> <p>6 Q. Yeah. So had --</p> <p>7 Was this the first time, you</p> <p>8 know, July 21, 2015, that you saw in writing</p> <p>9 that management was trying to, you know, create</p> <p>10 different -- I guess, you want to call them</p> <p>11 sub-units. I don't know how you --</p> <p>12 A. This is my first time seeing this.</p> <p>13 Yeah. Where they were doing that.</p> <p>14 Q. Okay.</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 And were there meetings</p> <p>18 between the union and management regarding this?</p> <p>19 A. Yes. That's what the whole process</p> <p>20 was supposed to be about.</p> <p>21 Q. Do you know approximately how many</p> <p>22 meetings were there?</p> <p>23 A. There were -- I believe, maybe --</p> <p>24 July -- there may have been three, two, maybe --</p>
<p style="text-align: right;">199</p> <p>1 didn't involve your specific unit where you were</p> <p>2 working?</p> <p>3 A. Oh, yeah. Definitely.</p> <p>4 Q. Okay.</p> <p>5 A. Whatever expertise or whatever</p> <p>6 information and knowledge base I have, yes. It</p> <p>7 would be utilized.</p> <p>8 Q. So at this time you were part of the</p> <p>9 management team, but it was also affecting you</p> <p>10 personally in your job?</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 And here under these numbers</p> <p>14 on Exhibit 6 here, is that -- No. 1, consolidate</p> <p>15 educational advocacy with Jumpstart outreach, is</p> <p>16 that where you were saying before where they</p> <p>17 were trying to separate out?</p> <p>18 A. Exactly. Yes.</p> <p>19 Q. Is this the first time that they had</p> <p>20 been doing this, trying to separate out these</p> <p>21 positions? Or had it been done before?</p> <p>22 A. Traditionally, when they were</p> <p>23 targeting predominantly African-American units,</p> <p>24 it had -- management had, you know, under</p>	<p style="text-align: right;">201</p> <p>1 July, there may have been two. And after the</p> <p>2 third meeting is when they just came and they</p> <p>3 had -- they already made their mind up, and they</p> <p>4 just discontinued the talks.</p> <p>5 Q. Okay.</p> <p>6 A. So there may have been another meeting</p> <p>7 in August -- like, August, September. And by</p> <p>8 the time October, I believe, they just went</p> <p>9 ahead and initiated it; that this is what we're</p> <p>10 going to do.</p> <p>11 Q. And is that is -- is that what is in</p> <p>12 this document?</p> <p>13 A. They --</p> <p>14 Q. Did they do what's in this document?</p> <p>15 A. No. This document denotes that it's</p> <p>16 open for discussion.</p> <p>17 Q. All right.</p> <p>18 Well, let's go through it.</p> <p>19 Number 1, did they consolidate those educational</p> <p>20 advocacy, 3 PO's, with the Jumpstart outreach, 4</p> <p>21 PO's? Do you know if they did that?</p> <p>22 A. Education -- yes. But it had already</p> <p>23 been done with me and Nelson.</p> <p>24 Q. Okay.</p>

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<p style="text-align: right;">202</p> <p>1 And then -- I mean, I know the 2 answer to this. But No. 2, that's you and 3 Mr. Nelson? 4 A. Yes. 5 Q. So you guys were reassigned, correct? 6 A. Yes. 7 Q. All right. Did No. 3 happen? I don't 8 even know what that means. SPO Rivera 9 reassigned. 10 A. Yeah. 11 Q. What's the difference between -- 12 what's RUR? 13 A. RUR is release upon request. And 14 that's when a minor is being released from the 15 Temporary Detention Center, the Audy Home. The 16 judge usually specifies where that minor -- who 17 that minor is to be released to and SPO 18 Rivera -- I don't want to get too far into it. 19 Q. Yeah. No. That's fine. I just -- 20 A. Yeah. 21 Q. I just wanted a little bit 22 clarification for the record. 23 A. Release upon request. 24 Q. Got it.</p>	<p style="text-align: right;">204</p> <p>1 Q. All right. No. 5, do you know if that 2 happened? 3 It just looks, again, 4 reassigning Roberts to a different supervisor, 5 right? 6 A. She -- she was under Meehan for a 7 short bit. Where she is now, I don't know. 8 Q. Okay. And the SPO means supervisory 9 probation officer? 10 A. Supervisory probation officer, 11 correct. 12 Q. All right. We can move off that 13 document. 14 Back onto the complaint, which 15 is Exhibit 1, Paragraph 71. "This 16 reassignment" -- which is the reassignment we 17 have been talking about -- "was taken in 18 retaliation against Nelson and Chapman for their 19 former complaints of race discrimination and 20 their association in defense of their right to 21 be free from race discrimination." 22 Do you see that? 23 A. Yes. 24 Q. All right. What formal complaints are</p>
<p style="text-align: right;">203</p> <p>1 A. Okay. 2 Q. Thank you. 3 Okay. And then looking to 4, 4 did that happen? 5 A. I guess you can see I'm used to 6 talking to kids. 7 Q. That's fine. 8 A. No. 5? 9 Q. 4 and 5. Do you know if those 10 happened? 11 Sorry, 4. Do you know if that 12 happened; which was "Assign the clinical intake 13 staff." I guess it looks like that was just 14 reassigning it to a different supervisor. 15 A. No. What was supposed to take place 16 in No. 4, both of those are white officers. 17 That was totally not done and it actually -- 18 they came -- actually, they made out very well 19 because Parysz doesn't, to my knowledge, 20 supervise anyone. And Petchenik, she 21 supervises, but she actually -- not to that 22 degree. 23 Q. Okay. 24 A. Yeah.</p>	<p style="text-align: right;">205</p> <p>1 you referring to there? 2 A. We -- we -- grievances. We have 3 written actual -- the union has written on our 4 behalf, not only to management but to the office 5 of the Chief Judge, to the Chief Judge; tried to 6 set up meetings with the Chief Judge personally. 7 Nelson and I have both also written Keith Sevic 8 personally. 9 Q. Complaining of discrimination? 10 A. Of course. Yes. 11 Q. All right. 12 A. Uh -- 13 Q. And did -- had you -- 14 I think I know the answer to 15 this, but had you filed an EEOC charge prior to 16 this reassignment? 17 A. Yes. 18 Q. All right. 19 A. This is part of the retaliation that 20 came from that. 21 Q. All right. 22 A. Our lives changed drastically after 23 that. 24 Q. All right. We'll go over those next</p>

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<p style="text-align: right;">206</p> <p>1 to clarify it.</p> <p>2 A. Okay.</p> <p>3 Q. All right. I think you testified to</p> <p>4 this a little bit, but I just want to be clear.</p> <p>5 Was your salary reduced when</p> <p>6 you were reassigned out of Jumpstart?</p> <p>7 A. No.</p> <p>8 Q. All right.</p> <p>9 And is the Jumpstart program</p> <p>10 still called Jumpstart or is it called something</p> <p>11 different?</p> <p>12 A. Still called Jumpstart.</p> <p>13 Q. All right.</p> <p>14 And to your knowledge, who</p> <p>15 made the decision for -- put in quotes -- "the</p> <p>16 reorganization of Jumpstart?"</p> <p>17 A. Avik Das and William Patterson.</p> <p>18 Q. So we've gone through your</p> <p>19 allegations, yours and Mr. Chapman's allegations</p> <p>20 that are in the complaint --</p> <p>21 A. Mr. Nelson's.</p> <p>22 Q. I'm sorry. You're Mr. Chapman.</p> <p>23 A. That's okay.</p> <p>24 Q. It was supposed to be Mr. Nelson</p>	<p style="text-align: right;">208</p> <p>1 for one week, I recommended myself for more</p> <p>2 training because I saw that there was a</p> <p>3 liability that could be incurred on me as well</p> <p>4 as the case with Anthony Jordan, because I</p> <p>5 initially asked to receive only three cases</p> <p>6 until I became acclimated with being a field</p> <p>7 officer and all the duties -- to execute all of</p> <p>8 the duties. But when I got to the unit, I had</p> <p>9 30 cases. At least five of those were</p> <p>10 high-profile cases, one of which the minor</p> <p>11 eventually ended up incarcerated for killing a</p> <p>12 lady. That could have easily been another</p> <p>13 "Anthony Jordan" situation for me.</p> <p>14 I was brought there for</p> <p>15 operational need. I would have -- I would have</p> <p>16 thought that after that so-called operational</p> <p>17 need had no longer been, that I could have been</p> <p>18 afforded the opportunity to be transferred out</p> <p>19 into some other unit. But, unfortunately, they</p> <p>20 allowed a white female officer with far less</p> <p>21 seniority than me who had only been in the</p> <p>22 department, I believe, two years -- less than</p> <p>23 two years. She was allowed to transfer out of</p> <p>24 the unit that I was forced into based on</p>
<p style="text-align: right;">207</p> <p>1 today.</p> <p>2 So is there anything else, any</p> <p>3 other specific allegations of discrimination</p> <p>4 against you personally that you believe happened</p> <p>5 to you that we haven't talked about yet?</p> <p>6 A. The more recent stuff that just</p> <p>7 recently happened to me?</p> <p>8 Q. Sure.</p> <p>9 A. I was moved into this field unit with</p> <p>10 only one-and-a-half day of training, which posed</p> <p>11 a threat to myself. When I named it earlier</p> <p>12 "The Anthony Jordan rule," I was not adequately</p> <p>13 trained. I was given one-and-a-half day of</p> <p>14 training when an actual field officer received</p> <p>15 no less than eight weeks of training.</p> <p>16 Considering I had been in a</p> <p>17 specialized unit for over 13 years, there was</p> <p>18 certain things that had changed as related to</p> <p>19 being a field officer, certain programs and</p> <p>20 different things had been in place. Just giving</p> <p>21 me a day and a half of PowerPoint did not</p> <p>22 adequately provide me the training that I needed</p> <p>23 to dispense my duties as a field officer.</p> <p>24 After being placed in the unit</p>	<p style="text-align: right;">209</p> <p>1 operational need.</p> <p>2 Q. Okay. What was her name?</p> <p>3 A. Patty Calderon.</p> <p>4 Q. Okay. And where did she go?</p> <p>5 A. She went to EM, I believe. EM or IPS.</p> <p>6 I think it's IPS.</p> <p>7 Q. Just before -- so let's focus on this</p> <p>8 and then if there's more, that's fine.</p> <p>9 A. Sure. Sure.</p> <p>10 Q. So about your training, you testified</p> <p>11 before -- and always correct me if I misspeak --</p> <p>12 that all employees coming to JPD are basically</p> <p>13 trained like field officers, correct?</p> <p>14 A. Correct.</p> <p>15 Q. So did you receive that when you</p> <p>16 started?</p> <p>17 A. When I started, yes.</p> <p>18 Q. And I know that was a long time ago</p> <p>19 but...</p> <p>20 A. Yes. Yes.</p> <p>21 Q. All right.</p> <p>22 And is that the eight weeks of</p> <p>23 training you're referring to?</p> <p>24 A. It was about 12 -- about 12 --</p>

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<p style="text-align: right;">210</p> <p>1 about 12 -- it's about three months of training. 2 Yes. 3 Q. Okay. 4 All right. And so then when 5 you are reassigned as a field officer, did you 6 want to then, like, redo that initial training? 7 A. Not the whole training, but I would 8 have hoped that I would have been at least given 9 to be able to shadow a field officer. I would 10 have been able to be given an outline of what we 11 mostly deal with, which is a family folder which 12 constitutes the whole client's existence from 13 front to back; from their initial court order, 14 the docket; the family background; you flip that 15 over, their assessment; and then you flip that 16 over, you have different notes that a probation 17 officer may leave; and then you flip that over, 18 then you have all of their documentation from 19 school, psychological records, any DNA that they 20 may have had done. 21 And then on the final sheet, 22 you have their social -- the social evaluation 23 that should actually be outlined in a normal 24 format to where you know what -- how to compose</p>	<p style="text-align: right;">212</p> <p>1 utilized. 2 Q. Okay. 3 A. We also have JEMS, that antiquated 4 system I was talking about, similar to the 5 Commodore 64. When we put the things in JEMS, 6 contacts denote, just like in a social service 7 agency, you're able to bill. For billing you 8 get reimbursed. Those are the two main things 9 that was emphasized. Not the actual family 10 folder. Not this is what it looks like. You 11 may have had this training 14 years ago, but 12 there's some things that has changed that you 13 should know about it. 14 This is what they use when 15 they are auditing you or when they are doing -- 16 pulling your files or your folders. These are 17 what the supervisor or deputy or management is 18 looking for in the event that you are targeted 19 for -- to have your folders audited. 20 None of that was brought to 21 where I thought, now that I know being a field 22 officer -- even now when interns come in, I make 23 sure that they know what a family folder is, how 24 it's supposed to be composed, and the relevancy</p>
<p style="text-align: right;">211</p> <p>1 it and what it's supposed to read to the judge, 2 to the state's attorney, to the PD, so that you 3 know, actually, what all the relevancy of 4 everything in this important-otherwise folder 5 that they have used to suspend and terminate 6 African-American officers discriminately. I did 7 not receive any of that. 8 Q. So what training did you get when this 9 happened? 10 A. I received -- 11 Q. Sorry. 12 When I say "this happened," I 13 meant when the reassignment to the field. 14 A. That's a good question. 15 I received questions on what 16 they considered the money training. Money 17 training is how the department can reimburse for 18 services that we do that they can get 19 reimbursement for. One of which is the YAZI. 20 YAZI is an assessment tool that was customarily 21 used by social service agencies. 22 Under this the government -- 23 the -- our department is able to get Federal 24 funds reimbursed to them for services that we</p>	<p style="text-align: right;">213</p> <p>1 of each document. I just do that out of 2 consideration because I would have wanted it 3 done for me. 4 Q. Okay. During the 12 years you were in 5 Jumpstart, did you ever go out in the field with 6 a field probation officer? 7 A. If I had to it was to -- where the 8 officer thought that my presence may motivate 9 the minor to come to the program to attend 10 school. 11 Q. And how often would you said you'd do 12 that? 13 A. I just made myself available. As long 14 as it didn't conflict with my normal duties, I 15 would make myself available. That's one of the 16 reasons why I received a lot of commendations 17 from my fellow officers because I made myself 18 available as they needed. 19 If I needed to talk to one of 20 their clients, I would and vice versa. That's 21 where the tutoring came in. We would tutor 22 other officer's clients. 23 Q. Okay. 24 Again, I know it's hard to put</p>

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<p style="text-align: right;">214</p> <p>1 a number on it. How often would you do</p> <p>2 something like that?</p> <p>3 A. For going out in the field?</p> <p>4 Q. Yeah.</p> <p>5 A. As it became a regular occurrence, it</p> <p>6 was -- it could happen weekly. Not every day</p> <p>7 during the week, but it could happen weekly.</p> <p>8 Q. I think I've got enough for the</p> <p>9 training when you were reassigned.</p> <p>10 Is there anything else? Any</p> <p>11 other specific instances of discrimination that</p> <p>12 we haven't talked about?</p> <p>13 A. Just recently I had to file a</p> <p>14 grievance because Avik -- well, I think we</p> <p>15 talked about it. Avik has denied my comp time.</p> <p>16 Q. Right. We did.</p> <p>17 But is there anything else you</p> <p>18 want to add?</p> <p>19 A. Okay. It's just that now going</p> <p>20 forward I'm a lot more cognizant of how</p> <p>21 undermining and how discriminatory this is as it</p> <p>22 relates to the disparate treatment to me.</p> <p>23 Q. Any other specific disparate treatment</p> <p>24 that we haven't talked about?</p>	<p style="text-align: right;">216</p> <p>1 later to -- because you may answer it in some of</p> <p>2 your questions.</p> <p>3 Q. Oh. No. If there's something else, I</p> <p>4 mean, we're gonna go through your</p> <p>5 interrogatories but...</p> <p>6 A. Let's go. Let's go.</p> <p>7 MR. HAYES: Okay. All right. I want</p> <p>8 to go through your EEOC charges.</p> <p>9 THE WITNESS: All right.</p> <p>10 (WHEREUPON, Chapman Deposition</p> <p>11 Exhibit No. 7 was marked for</p> <p>12 identification.)</p> <p>13 BY MR. HAYES:</p> <p>14 Q. Okay. Mr. Chapman, you have been</p> <p>15 handed what's been marked Exhibit 7. Do you</p> <p>16 recognize this?</p> <p>17 A. Yes.</p> <p>18 Q. All right. It's Bates-stamped</p> <p>19 Defendant 2137 and 2138.</p> <p>20 And what is this?</p> <p>21 A. It's a Charge of Discrimination, an</p> <p>22 EEOC complaint.</p> <p>23 Q. And at the bottom of the first page,</p> <p>24 is that your signature?</p>
<p style="text-align: right;">215</p> <p>1 A. We've covered a lot. Yep. But we're</p> <p>2 good.</p> <p>3 Q. All right.</p> <p>4 MR. GEOGHEGAN: Sure. I'm sorry. I'm</p> <p>5 recovering from a cold. I'm a little out of it.</p> <p>6 How much longer are you going to go? I want to</p> <p>7 take a break.</p> <p>8 MR. HAYES: Yes. We can take a break.</p> <p>9 Yeah. I'm switching gears. We can take a</p> <p>10 break.</p> <p>11 MR. GEOGHEGAN: Okay.</p> <p>12 MR. HAYES: Let's go off the record.</p> <p>13 (WHEREUPON, a brief recess</p> <p>14 was held.)</p> <p>15 MR. HAYES: Back on the record.</p> <p>16 THE WITNESS: You said was there</p> <p>17 anything that I left off?</p> <p>18 MR. HAYES: Yes.</p> <p>19 THE WITNESS: That I missed?</p> <p>20 MR. HAYES: Right.</p> <p>21 BY MR. HAYES:</p> <p>22 Q. Okay. Is there anything else? You</p> <p>23 said --</p> <p>24 A. Will there be another opportunity</p>	<p style="text-align: right;">217</p> <p>1 A. Yes.</p> <p>2 Q. And the date is August 18, 2014?</p> <p>3 A. Yes.</p> <p>4 Q. And under "Discrimination Based On,"</p> <p>5 you have both "Race" and "Retaliation" checked.</p> <p>6 Is that right?</p> <p>7 A. Yes.</p> <p>8 Q. All right. And you have the</p> <p>9 "Continuing Action" box checked, right?</p> <p>10 A. Yes.</p> <p>11 Q. All right.</p> <p>12 So I want to just kind of ask</p> <p>13 you a couple questions on "The Particulars Are."</p> <p>14 Do you see the box for the -- you write in what</p> <p>15 the particulars are of your charges. Do you see</p> <p>16 that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay.</p> <p>19 It says, "I have been</p> <p>20 subjected to different terms and conditions of</p> <p>21 employment, including, but not limited to,</p> <p>22 regulations regarding compensatory time and</p> <p>23 lowered performance evaluations." Do you see</p> <p>24 that?</p>

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<p style="text-align: right;">218</p> <p>1 A. Yes. 2 Q. All right. 3 So what are you referring to 4 here when you say "compensatory time 5 regulations?" 6 A. Is that an open-ended question or is 7 that something specific? 8 Q. No. It can be open-ended. What 9 specifically -- well, both. 10 What specifically are you 11 referring to here in this charge when you're 12 saying you were "subjected to different terms 13 and conditions of employment." And one of the 14 things you list is your compensatory time 15 regulations. 16 And keep in mind this is 17 August 18, 2014. 18 A. I was always -- with the retaliation 19 and also with the discrimination and disparate 20 treatment, the bias, I was always having new 21 conditions placed upon my being afforded the 22 same rights and privileges that my white 23 colleagues had but did not have to go through or 24 jump through all these other extra hurdles and</p>	<p style="text-align: right;">220</p> <p>1 understand you checked "continuing action," but 2 I guess I wanted to know what -- when you wrote 3 this, what specific compensatory time regulation 4 were you referring to? 5 A. There was -- I believe the deputy 6 chief probation officer who was now -- I believe 7 it was Melissa Spooner, who came and perpetuated 8 even more of the racial discrimination that had 9 been experienced prior to. And she was putting 10 in even more provisions that was so-called not 11 just regulating but preventing me from obtaining 12 comp time. Or when I did do the job, she then 13 also could reject it even if it had been vetted 14 and it had been found credible and there was 15 reason for it to be obtained. 16 Q. All right. So you weren't getting 17 comp time at this time? 18 A. I was not only denied comp time, I was 19 denied the use of my comp time. And that -- I 20 used to be able to as other officers -- white 21 officers -- be able to use it in one-hour 22 increments, I was forced to use mine now in 3.5 23 hour increments, which was to exhaust my time 24 that I had on the books even more expeditiously.</p>
<p style="text-align: right;">219</p> <p>1 all these other stipulations that had to be 2 added. And the difficulties that -- that was 3 being placed on me, they didn't have to go 4 through that. And so that's -- I was noting 5 that. 6 Q. What specifically are you referring to 7 when you say "compensatory time?" 8 A. Well, initially, it was just a 9 discussion, according to the contract, between 10 you and your supervisor. And basically your 11 supervisor, according to the contract, was made 12 knowledgeable of the time that you would work 13 beyond your work hours, the reason and the 14 nature of it, and that was enough for me. 15 Then it became the deputy had 16 to sign off. Then it had to be where then Avik 17 reserved the right to still -- even after those 18 checks and balances, he still somehow put in a 19 provision that he could still reject it even 20 after it's already been vetted. 21 Q. Is this referring to what happened in 22 2014? 23 A. It's been ongoing. 24 Q. Okay. I just want to -- and I</p>	<p style="text-align: right;">221</p> <p>1 Q. So let's talk about that. So you were 2 told at this time that you had to use your comp 3 time in three-and-a-half-hour increments? 4 A. Yes. Even when there were white 5 officers like Marty Gleason and Steve Kaspersky 6 who was still using theirs in one-hour 7 increments. 8 Q. All right. 9 Were you aware of any 10 African-American employees that were allowed to 11 use their comp time in one-hour increments? 12 A. No. Not that -- not that I could 13 recollect. 14 I just referenced the 15 statement that DCPO Neal made to me that was, 16 "what makes you think you should get what other 17 people get." So that -- that there was a 18 different standard for some than others. 19 Q. All right. 20 And then the next thing you 21 say is "lowered performance evaluation." 22 A. Yes. 23 Q. What specifically are you referring to 24 when you wrote that here?</p>

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<p style="text-align: right;">222</p> <p>1 A. During the retaliatory treatment that 2 I was receiving, my evaluations eventually 3 started becoming -- they were intentionally 4 missing information. They had misrepresented 5 information. 6 Q. Who was doing your performance 7 evaluations at this time? 8 A. Tina Young. 9 Q. And so you believe that they were 10 lower than they should have been? 11 A. Oh, definitely. 12 Q. And that's because of, one, because 13 you're African American? 14 A. Definitely. 15 Q. And the second is because you had 16 complained about race discrimination? 17 A. Yes. 18 Q. All right. So prior to this -- sorry. 19 Let's back up for a second. 20 Lowered performance 21 evaluation. I assume if you get a lower 22 performance evaluation, based on what we talked 23 about earlier, you don't get your merit bonus, 24 right?</p>	<p style="text-align: right;">224</p> <p>1 Meeting standards is between 400 and 599. Below 2 standards is below 400. 3 Q. Were you getting below standards or 4 meeting standards? 5 A. I was still meeting standards, but it 6 was the low end of meeting standards which is -- 7 I take myself -- I'm a consummate professional. 8 And I don't have to have that just be my 9 objective to exceed. I just do my job and it 10 comes natural for me. 11 Q. Prior to the filing of this EEOC 12 charge -- which we'll state for the record is 13 440-2014-05395 -- had you filed an EEOC charge 14 prior to this? 15 A. Yes. Because this is a continuation. 16 I don't have the date right off but yes. 17 Q. All right. 18 Can you tell me how many 19 individual EEOC charges you have filed against 20 Office of the Chief Judge, Circuit Court of Cook 21 County? 22 A. I'm thinking -- I may have lost count 23 at probably five. 24 Q. Okay.</p>
<p style="text-align: right;">223</p> <p>1 A. Right. 2 Q. Is there any other negative 3 consequence from a lower -- a lowered 4 performance evaluation? 5 A. It doesn't reflect your true body of 6 work. 7 Q. So -- but what I'm asking is, is there 8 any other tangible consequence of a lowered 9 performance evaluation? 10 A. That's tangible to me. 11 Notwithstanding the merit, I want what I've done 12 to reflect in my evaluation. 13 Q. Outside of the merit bonus, do you 14 lose any money because of a lowered performance 15 evaluation? 16 A. No, not money. 17 Q. All right. 18 And when you say "lowered 19 performance evaluation," like, how low were 20 they? 21 A. Oh, they were very low. Like 400. 22 Q. I don't know what that means. 23 A. Well, mine was a scale of -- the 24 highest was -- exceeding was 600 and above.</p>	<p style="text-align: right;">225</p> <p>1 A. And I won this arbitration, by the 2 way. 3 (WHEREUPON, Chapman Deposition 4 Exhibit No. 8 was marked for 5 identification.) 6 BY MR. HAYES: 7 Q. All right. You have been handed 8 Exhibit 8, but you just said something. 9 MR. HAYES: Did you get that 10 arbitration -- 11 THE REPORTER: Yes, I did. 12 BY MR. HAYES: 13 Q. All right. I just want to follow up 14 on that. 15 Mr. Chapman, when you said you 16 won the arbitration, is that a grievance you're 17 talking about? 18 A. Well, the grievance was moved after 19 the Chief Judge said -- struck it down or his 20 designee that said that I didn't have grounds or 21 didn't have -- the grievance didn't have merit. 22 And remember when I told you whenever African 23 Americans file grievances, they never get 24 resolved at the Chief Judge's level.</p>

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<p style="text-align: right;">226</p> <p>1 So a neutral arbitrator heard 2 my case and Mr. Nelson's case, and we 3 actually -- not only did we not -- not only did 4 we show that we -- our performance standards 5 exceeded, but we were also worthy of the merit 6 pay. 7 Q. Okay. So you're talking about for 8 your performance evaluation? 9 A. Yes. 10 Q. So your performance evaluations, they 11 were changed? 12 A. They were not. The arbitrator can't 13 change them, but he makes a note that there was 14 things that management failed to execute their 15 duties. As -- I don't want to be long winded. 16 I don't want to be long winded. 17 Q. No. You're good. You're doing fine. 18 You're over thinking him just leaning back. 19 A. Okay. I don't want to be long winded 20 but... 21 Q. And I'm just trying to understand, 22 like, what the process of what happened. 23 A. We went through the steps. Step 2, 24 Step 3, Step 4, Chief Judge.</p>	<p style="text-align: right;">228</p> <p>1 Q. But you received the merit pay? 2 A. Yes. Yes. 3 Q. All right. 4 Do you expect to receive it 5 for 2015? 6 A. Oh, definitely now. 7 Q. Okay. Well, let's turn -- we can put 8 Exhibit 7 away, hopefully, for good, and go to 9 Exhibit 8, which she just handed you. 10 This is another EEOC charge. 11 Do you recognize this? 12 A. Yes. 13 Q. All right. 14 Is that your signature at the 15 bottom there? 16 A. Yes. 17 Q. And for the record, it's Defendant 18 2134 through 2133. So let's just say it's 2134. 19 A. Yes. 20 Q. Okay. 21 And the date is December 4, 22 2015, is that right, at the bottom there? 23 A. Yes. Yes. 24 Q. Okay.</p>
<p style="text-align: right;">227</p> <p>1 Q. Arbitration is part of the process, 2 right? 3 A. Arbitration is after Step 4. 4 Q. As outlined in the CBA? 5 A. Correct. 6 Q. All right. Got it. 7 A. And a neutral arbitrator. 8 Q. And you received your merit bonus pay 9 for these evaluations? 10 A. It should be forthcoming. 11 Q. Sorry. Is that a yes? 12 A. Yes. 13 Q. You haven't got it yet? 14 A. Not yet. 15 Q. But you plan on getting it? 16 A. It's forthcoming. Yes. 17 Q. For how many years is that for? 18 A. This is '13 and '14. 19 Q. All right. 20 A. And now management is negotiating with 21 Patrick and I for the 2015. 22 Q. All right. And you said you received 23 the '16 though, right? 24 A. '16, I exceeded.</p>	<p style="text-align: right;">229</p> <p>1 And you also here checked 2 "Race" and "Retaliation," correct? 3 A. Yes. 4 Q. "Continuing Action," correct? 5 A. Yes. 6 Q. And here you refer in your -- in "The 7 Particulars Are" box, you refer to your EEOC 8 charge we just were discussing; is that right? 9 A. Yes. 10 Q. All right. 11 All right. So I want to go 12 through kind of the same thing we did before 13 where it says, "Subsequently, I was subjected to 14 different terms and conditions, including, but 15 not limited to, scrutiny, policy changes, 16 inaccurate performance evaluations and being 17 placed in a field probation officer position." 18 We talked about the 19 reassignment. 20 A. Yes. 21 Q. The inaccurate performance 22 evaluations, are you still referring to the same 23 ones that we talked about? 24 A. This is 2015 now.</p>

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<p style="text-align: right;">230</p> <p>1 Q. Okay.</p> <p>2 A. This is for -- this covered 2015 in</p> <p>3 which --</p> <p>4 Q. So we have three years that you say</p> <p>5 they were lower --</p> <p>6 A. '13, '14, '15.</p> <p>7 Q. -- than they should be?</p> <p>8 A. Yes. Yes.</p> <p>9 Q. All right.</p> <p>10 And they have all, at least,</p> <p>11 are close to subsequently being --</p> <p>12 A. '13 and '14 is done.</p> <p>13 Q. All right.</p> <p>14 A. We're just waiting on the merit pay to</p> <p>15 appear on our paychecks. We've gotten notice</p> <p>16 from the union; the e-mail, we won, and you</p> <p>17 guys, congratulations, you were successful.</p> <p>18 Q. And, again, you say "we." It's you</p> <p>19 and Mr. Nelson, correct?</p> <p>20 A. Me and Mr. Nelson. Correct.</p> <p>21 Q. And you guys had the same supervisor,</p> <p>22 right, at this time?</p> <p>23 A. Correct.</p> <p>24 Q. Tina Young?</p>	<p style="text-align: right;">232</p> <p>1 consummate professional. If I'm trained</p> <p>2 adequately, I'm going to do my job and then</p> <p>3 some.</p> <p>4 Q. But you weren't disciplined during</p> <p>5 this time, right?</p> <p>6 A. No. I'm that guy that will work four</p> <p>7 or five hours late to make sure that my stuff is</p> <p>8 up to par.</p> <p>9 Q. But no discipline, right?</p> <p>10 A. No.</p> <p>11 Q. Okay.</p> <p>12 Other than the merit pay we</p> <p>13 talked about, no -- was there any loss of pay?</p> <p>14 A. No. Other than the scrutiny is</p> <p>15 denying me the opportunity to obtain comp time,</p> <p>16 forcing me to use my comp time in hours of</p> <p>17 three-and-a-half, which I'm losing money that</p> <p>18 way because I might not necessarily need to use</p> <p>19 three-and-a-half hours. I may only need to use</p> <p>20 one hour.</p> <p>21 Q. And when you refer in your charge here</p> <p>22 to "policy changes," are you talking about the</p> <p>23 comp time changes?</p> <p>24 A. That and when they were doing the</p>
<p style="text-align: right;">231</p> <p>1 A. Yes, and the same deputy chief.</p> <p>2 Q. How far did Ms. Young go back?</p> <p>3 A. 2008.</p> <p>4 Q. All right.</p> <p>5 So there were times when she</p> <p>6 was giving you exceeds, right?</p> <p>7 A. Up until this retaliation and her</p> <p>8 friend, William Patterson, got promoted to HR</p> <p>9 Director.</p> <p>10 Q. And so just to be clear, you believe</p> <p>11 that your -- these 2013, 2014 and '15</p> <p>12 performance evaluations were because you</p> <p>13 complained of discrimination?</p> <p>14 A. Correct.</p> <p>15 Q. Okay.</p> <p>16 A. And the filing of the lawsuit for</p> <p>17 discrimination.</p> <p>18 Q. Okay.</p> <p>19 All right. So here -- back to</p> <p>20 the -- the EEOC charge. You say you're subject</p> <p>21 to scrutiny. What do you mean by "scrutiny?"</p> <p>22 A. You know, it was always now I was</p> <p>23 being watched, micromanaged, couldn't do</p> <p>24 anything right although I -- again, I was a</p>	<p style="text-align: right;">233</p> <p>1 policy changes is when they make up stuff and</p> <p>2 there's nothing written. And then --</p> <p>3 Q. I don't know what that means.</p> <p>4 A. Well, just like now where they are</p> <p>5 making up a different policy for me to see my</p> <p>6 families. If I gotta work and do overtime,</p> <p>7 there's this imaginary policy. But when I ask</p> <p>8 for it, it doesn't exist. It's just verbal</p> <p>9 instructions for me.</p> <p>10 Q. Yeah.</p> <p>11 So in this charge, what policy</p> <p>12 changes are you referring to?</p> <p>13 A. Well, the same thing goes. As I was</p> <p>14 trying to dispense my duties even then as the</p> <p>15 Jumpstart instructor, they would continuously</p> <p>16 change things.</p> <p>17 Q. Give me an example.</p> <p>18 A. They changed it from -- the time span</p> <p>19 from 12 weeks to 10 to 8. And then they changed</p> <p>20 it to -- instead of having four or five cycles,</p> <p>21 where we had time to take some time off, you</p> <p>22 know, if we had to go to doctor's appointments,</p> <p>23 now it was ongoing.</p> <p>24 Q. And that was just you in Jumpstart or</p>

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<p style="text-align: right;">234</p> <p>1 everyone in Jumpstart?</p> <p>2 A. It was me and Nelson for the most</p> <p>3 part. Because they had -- they even divided the</p> <p>4 room up in half and that was just -- that was</p> <p>5 just inhumane, actually. They divided the room</p> <p>6 in half. We came to work one day, and the room</p> <p>7 was actually divided in half. It's already</p> <p>8 close -- close quarters. Now they divided it in</p> <p>9 half.</p> <p>10 And so we are in this room and</p> <p>11 half of the room with minors that already are</p> <p>12 coming in with animosity towards each other. So</p> <p>13 it created a very, very, you know, almost a</p> <p>14 hard -- hostile work environment.</p> <p>15 Q. And when was this room divided in</p> <p>16 half?</p> <p>17 A. It was -- it was around this time.</p> <p>18 Q. So around 2015?</p> <p>19 A. 2014, '15, yeah.</p> <p>20 Q. Oh, '14.</p> <p>21 A. Yeah. And it continued on. It was,</p> <p>22 like, the end of '14. It was throughout this</p> <p>23 whole time.</p> <p>24 Q. All right.</p>	<p style="text-align: right;">236</p> <p>1 privileged and the good 'ole boy and the -- it</p> <p>2 did not affect whites in the same manner. It</p> <p>3 almost always had a negative impact on black</p> <p>4 officers, African-American officers, whereas</p> <p>5 somehow --</p> <p>6 Q. What department-wide policy are you</p> <p>7 referring to?</p> <p>8 A. There was -- like with -- oh, I'll</p> <p>9 give you an example.</p> <p>10 With my time sheets, I found</p> <p>11 that my time sheets had been tampered with,</p> <p>12 whereby I had loss of comp time that I had</p> <p>13 accrued. Now, this is comp time I'm speaking</p> <p>14 of, but it's dealing with time sheets.</p> <p>15 And until I did an audit of my</p> <p>16 time, which I kept a log -- and this is before</p> <p>17 we went to the electronic system. And I went to</p> <p>18 personnel and asked them for an update on my</p> <p>19 time, and I found out that I was short almost</p> <p>20 59, maybe 60 hours of comp time. And I asked,</p> <p>21 how can that be?</p> <p>22 So I went to the union, who</p> <p>23 then requested my records, my time sheet where</p> <p>24 we signed in and out daily. And after obtaining</p>
<p style="text-align: right;">235</p> <p>1 So December 4, 2015, you had</p> <p>2 already been reassigned out of Jumpstart; is</p> <p>3 that right?</p> <p>4 A. Right. I'm out.</p> <p>5 Q. All right.</p> <p>6 I'm looking, again, for any --</p> <p>7 other than the comp time, which you've talked</p> <p>8 about, but any specific policy. And you just</p> <p>9 talked about the cycling and how that -- the</p> <p>10 cycles and how that changed.</p> <p>11 A. Right. Right.</p> <p>12 Q. Is there any other specific policy</p> <p>13 changes that you felt were directed towards you</p> <p>14 because of either your race or because you</p> <p>15 complained of race discrimination?</p> <p>16 A. Well, again, we already covered the</p> <p>17 comp time. We covered them forcing me to use</p> <p>18 more comp time than I needed. They were</p> <p>19 changing the policies with the program of</p> <p>20 Jumpstart. But for the most part, it applied to</p> <p>21 me and Nelson.</p> <p>22 They were also changing the</p> <p>23 policies that applied throughout the department</p> <p>24 that negatively impacted blacks, while the</p>	<p style="text-align: right;">237</p> <p>1 those, it was found that my time had been</p> <p>2 tampered with. Time had been scratched out.</p> <p>3 Q. When was this?</p> <p>4 A. This was in -- this was in -- around</p> <p>5 this time also. In the --</p> <p>6 Q. Can you be a little more specific, if</p> <p>7 you can?</p> <p>8 A. I don't have my exact date right now,</p> <p>9 but this is all in this same retaliatory motion.</p> <p>10 It's all going on and on. It was before -- it</p> <p>11 was before -- it was before November. It was</p> <p>12 before October. So it had to be, like, right</p> <p>13 around -- I'm thinking maybe June -- somewhere</p> <p>14 before 2015, June 2015.</p> <p>15 Q. Okay.</p> <p>16 A. And -- actually, no. It was in 2014</p> <p>17 because I believe Charles Young was still there.</p> <p>18 Yes. I believe it was 2014.</p> <p>19 Q. Okay.</p> <p>20 A. And that was the theft of my time.</p> <p>21 Whereas, if it was a black officer, he or she</p> <p>22 would have been recommended for termination.</p> <p>23 But they never ever told me how my time got</p> <p>24 stolen. They just somehow miraculously returned</p>

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<p style="text-align: right;">238</p> <p>1 it.</p> <p>2 Q. So you got it back?</p> <p>3 A. I got it back.</p> <p>4 Q. Okay. So you're saying "your policy</p> <p>5 changes." I would say that wasn't a policy</p> <p>6 change.</p> <p>7 A. Well --</p> <p>8 Q. What -- can you think of any other</p> <p>9 policy change?</p> <p>10 A. I'm trying to think of one</p> <p>11 specifically because I don't have those notes</p> <p>12 with me right now. But if --</p> <p>13 Q. What notes are you referring to?</p> <p>14 A. Well, I try to have mental notes of</p> <p>15 things that have occurred. You know, when</p> <p>16 you're traumatized by certain things, you know,</p> <p>17 you kind of leave a mental note, but then</p> <p>18 sometimes you block it out. So I'm trying to</p> <p>19 pull it from the back somewhere to the front.</p> <p>20 Q. All right.</p> <p>21 So you don't have -- do you</p> <p>22 have written notes about any of these?</p> <p>23 A. No. These are -- anytime you're</p> <p>24 traumatized by something and you're living with</p>	<p style="text-align: right;">240</p> <p>1 A. They just tried to rename those</p> <p>2 positions that -- that were created in</p> <p>3 Jumpstart, but they were still the educational</p> <p>4 advocacy portion that Mr. Nelson and I had</p> <p>5 already assumed those duties before we were</p> <p>6 reassigned.</p> <p>7 Q. Before we move on to that, so the</p> <p>8 newly created position, did you apply for that</p> <p>9 position?</p> <p>10 A. I was never told that I had to apply</p> <p>11 for a position that never had existed.</p> <p>12 Q. Okay. It says -- I'm --</p> <p>13 It says you weren't considered</p> <p>14 for a newly created position. Did you apply for</p> <p>15 that newly created position?</p> <p>16 A. Well, after we were removed then they</p> <p>17 so-called created and gave these positions now</p> <p>18 what -- that Mr. O'Connell have and these other</p> <p>19 people are -- given Ms. Jackson, when we left</p> <p>20 and they retained her, they just came up with a</p> <p>21 new name for her position. But when we were</p> <p>22 being removed, they never notified us that there</p> <p>23 were going to be these new positions.</p> <p>24 Q. So November 2015 when you were</p>
<p style="text-align: right;">239</p> <p>1 it, you kind of either suppress it, you know, or</p> <p>2 it's a day-to-day thing. It will come to me,</p> <p>3 but there were policies that I know specifically</p> <p>4 that had a negative impact on the -- on</p> <p>5 African-American officers like myself as well as</p> <p>6 others.</p> <p>7 Q. Okay. If you don't know specifics,</p> <p>8 that's fine. Just say it. I'm not looking for</p> <p>9 you to guess.</p> <p>10 A. Yes.</p> <p>11 Q. All right. So the last part here, it</p> <p>12 says -- last sentence of the first paragraph</p> <p>13 under charge. "I was not considered for a newly</p> <p>14 created position for which I performed the</p> <p>15 duties."</p> <p>16 Is that referring to the</p> <p>17 Jumpstart position?</p> <p>18 A. Yeah. They tried to -- go ahead. I'm</p> <p>19 sorry. Did you finish your question?</p> <p>20 Q. Well, just say is that -- answer the</p> <p>21 question "yes" or "no."</p> <p>22 A. Yes. Yes. I'm sorry. Yes.</p> <p>23 Q. And then I will ask you. What</p> <p>24 position are you referring to specifically?</p>	<p style="text-align: right;">241</p> <p>1 reassigned, you're saying that the position</p> <p>2 didn't exist?</p> <p>3 A. It didn't exist. They just --</p> <p>4 Q. But by December 4, 2015 it did?</p> <p>5 A. Yes.</p> <p>6 Q. Okay.</p> <p>7 All right. So we talked about</p> <p>8 these -- your two charges that I have are</p> <p>9 from -- the first one is August 18, 2014. The</p> <p>10 other one is December 4, 2015. And you said you</p> <p>11 thought you may have filed about five?</p> <p>12 A. I may have filed some -- let's see.</p> <p>13 There's one for the initial.</p> <p>14 Q. I guess -- well, first I just want to</p> <p>15 know if they are before or after these.</p> <p>16 A. Before.</p> <p>17 Q. Okay.</p> <p>18 A. And then there's some after.</p> <p>19 Q. There's more after. Okay.</p> <p>20 A. Yes.</p> <p>21 Q. When -- what's your latest charge that</p> <p>22 you filed?</p> <p>23 A. I believe it may be just may be -- it</p> <p>24 may be two -- just maybe one or two more.</p>

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<p style="text-align: right;">242</p> <p>1 Q. Okay.</p> <p>2 A. I'm thinking.</p> <p>3 Q. After December --</p> <p>4 A. It may have been --</p> <p>5 Q. -- 2015?</p> <p>6 A. Or did they combine these? Let's see.</p> <p>7 Because this is a continuation. So there should</p> <p>8 be one before this one. And there may be --</p> <p>9 should be one behind this one. But for right</p> <p>10 now --</p> <p>11 Q. Okay. We can maybe sort that out in a</p> <p>12 document request.</p> <p>13 A. Yeah.</p> <p>14 Q. Okay.</p> <p>15 But you're pretty sure that</p> <p>16 you filed at least one after December 4, 2015?</p> <p>17 A. I'm almost certain. You know, the</p> <p>18 discrimination has been so repetitive.</p> <p>19 Q. And then did you file anywhere else?</p> <p>20 Like the Department of Human Rights or --</p> <p>21 A. I filed a lot of Illinois Labor</p> <p>22 Relations charges.</p> <p>23 Q. I guess, specifically, did you file</p> <p>24 any charges of discrimination with the Illinois</p>	<p style="text-align: right;">244</p> <p>1 alleging race, discrimination, or retaliation</p> <p>2 that we have not talked about?</p> <p>3 A. We've covered a lot. There was</p> <p>4 some -- I just want to try to make sure I</p> <p>5 covered the most recent stuff that has happened</p> <p>6 to me. And I think I mentioned this -- with the</p> <p>7 comp time issue.</p> <p>8 Q. Well, let me ask you this. Did you</p> <p>9 file a charge of discrimination based on the</p> <p>10 comp time issue? The recent comp time issue.</p> <p>11 A. It's going to be forthcoming. It's a</p> <p>12 lot on the plate already.</p> <p>13 Q. But you haven't filed one yet?</p> <p>14 A. Not yet. I still have some time to</p> <p>15 formulate it.</p> <p>16 Q. All right.</p> <p>17 A. But it's forthcoming. Just some</p> <p>18 things have to come off the plate first.</p> <p>19 Q. Okay. I will move on unless you think</p> <p>20 of anything else.</p> <p>21 A. Yes.</p> <p>22 Q. If anything else comes up, just let me</p> <p>23 know.</p> <p>24 A. Okay.</p>
<p style="text-align: right;">243</p> <p>1 Department of Human Rights?</p> <p>2 A. I may have, but right now I don't --</p> <p>3 I'm at a loss.</p> <p>4 Q. Okay.</p> <p>5 Outside of your charges of</p> <p>6 discrimination with the EEOC and anything else</p> <p>7 that you mentioned today -- because I have asked</p> <p>8 you about complaints or other discrimination --</p> <p>9 is there anything you haven't mentioned that</p> <p>10 you --</p> <p>11 Specifically, are there any</p> <p>12 other complaints of discrimination that you</p> <p>13 made, either formally or informally, that we</p> <p>14 have not discussed today?</p> <p>15 A. I believe that this -- is that the one</p> <p>16 that was most recently submitted?</p> <p>17 Are you done?</p> <p>18 Q. With?</p> <p>19 A. With this right at this point.</p> <p>20 Q. Yeah. I'm just trying to close the</p> <p>21 loop here.</p> <p>22 A. Okay. All right.</p> <p>23 Q. Just for -- as you sit here today, are</p> <p>24 there any other complaints that you can think of</p>	<p style="text-align: right;">245</p> <p>1 Q. All right.</p> <p>2 Let's go back to the</p> <p>3 complaints, which should be where you were.</p> <p>4 Page 20 there, Paragraph 23 through 79 under the</p> <p>5 heading "Class Allegations." Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. All right.</p> <p>8 So you are aware that this</p> <p>9 lawsuit that you're a Plaintiff in, it's -- that</p> <p>10 it's potentially a class action. Do you</p> <p>11 understand that?</p> <p>12 A. Yes. Yes.</p> <p>13 Q. All right.</p> <p>14 And that it's making claims on</p> <p>15 behalf of all African-American juvenile</p> <p>16 probation department employees; is that right?</p> <p>17 A. Yes.</p> <p>18 Q. If you know, as you sit here today, do</p> <p>19 you know how many total employees are in the</p> <p>20 JPD?</p> <p>21 A. Roughly, maybe a little bit over maybe</p> <p>22 420. 420.</p> <p>23 Q. All right. And this will be an even</p> <p>24 more difficult question. How many of them,</p>

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<p style="text-align: right;">246</p> <p>1 either numbers or percentage, are African 2 American? 3 A. African Americans now make up about, I 4 think, 40 percent of the department. So that 5 may be around 180, I'm thinking. 6 Q. But 40 percent, roughly? 7 A. I'm thinking it's around 40-something 8 percent. 9 Q. All right. 10 Is that just a guess or have 11 you seen any numbers? 12 A. That's a guess. That's a guess. 13 Q. Okay. 14 All right. As you're sitting 15 here, do you think you could adequately 16 represent the interest of the class? 17 A. I do. 18 Q. Okay. And you are willing to do that? 19 A. Yes. 20 Q. All right. 21 So at the JPD who makes the 22 decisions to impose discipline? 23 A. The director. And there have been 24 issues where DCPOs have done it and until --</p>	<p style="text-align: right;">248</p> <p>1 Q. Does the director usually get involved 2 on performance evaluations? 3 A. If the employee disagrees with the 4 score of his evaluation, then he files a 5 grievance. Management, according to the CBA, 6 has an obligation to meet in order to try to 7 resolve -- 8 Q. But other than the grievance process, 9 does the director have any say in it? 10 A. Not according to the arbitration 11 agreement that's now been instituted. The 12 director can't. Is not supposed to. Can't. Is 13 not supposed to. 14 Q. All right. 15 A. But we know that. 16 MR. HAYES: Okay. Getting closer. 17 (WHEREUPON, Chapman Deposition 18 Exhibit No. 9 was marked for 19 identification.) 20 BY MR. HAYES: 21 Q. Let's do -- okay. 22 Mr. Chapman, you have been 23 handed what's been marked as Exhibit 9. And if 24 you look on the first page, it says, "Theodis</p>
<p style="text-align: right;">247</p> <p>1 President Jason Smith has also done a lot of 2 contesting of that. 3 Q. Contesting of what? 4 A. Of DCPOs -- 5 Q. Imposing discipline? 6 A. -- imposing discipline also. 7 Q. Okay. 8 Who at JPD would make transfer 9 reassignment decisions? 10 A. Director. 11 Q. Okay. 12 Who at JPD does performance 13 evaluations? 14 A. Supervisor is the first step and then 15 it goes to the deputy. 16 Q. DCPO? 17 A. DCPO, yes. 18 Q. And then does it go up the chain or is 19 the DCPO the last one to sign off on them? 20 A. After the DCPO then the actual 21 employee is -- then signs or not signs. 22 Q. Okay. So you've got supervisor, DCPO, 23 employee signing them; right? 24 A. Right.</p>	<p style="text-align: right;">249</p> <p>1 Chapman's Objections and Answers to Defendant's 2 Interrogatories." 3 Do you see that? 4 A. Yes. 5 Q. Do you recognize this document? 6 A. Yes. 7 Q. All right. 8 I want you to go to the second 9 to last page. It says "Verification" at the 10 top. 11 A. Yes. 12 Q. Do you see that? 13 A. Yes. 14 Q. Is that your signature? 15 A. Yes. 16 Q. Dated 7/18/17? 17 A. Yes. 18 Q. All right. 19 So is it fair to say you 20 reviewed these answers before you signed that? 21 A. Yes. 22 Q. All right. 23 When was the last time you 24 reviewed this Mr. Chapman?</p>

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<p style="text-align: right;">250</p> <p>1 A. Say it again. 2 Q. Pardon me? 3 A. Say it again. 4 Q. When was the last time you reviewed 5 these interrogatories? 6 A. The date of. 7/18. 7 Q. Okay. So as you sit here today, would 8 you agree everything is true and correct in 9 here? 10 A. It doesn't look tamperable. It looks 11 intact. 12 Q. Okay. 13 I'm going to go through a 14 couple specific ones in here. 15 A. Okay. 16 Q. I want to start with No. 2. I'm not 17 going to read the whole thing, but it says, "For 18 each person you believe has knowledge of any of 19 the facts underlying your claims against 20 Defendant, please state their full name" and 21 other things. 22 And you answered Jason Smith. 23 A. Yes. 24 Q. Okay.</p>	<p style="text-align: right;">252</p> <p>1 attorney and that hasn't been produced to me? 2 A. No. 3 Q. And in C here it says, "EEOC charges 4 filed by", and it lists several individuals. 5 "Howard Brown, Lauren Brown," etc. 6 Do you see that? 7 A. Yes. 8 Q. Yes. 9 You wouldn't have those in 10 your possession, would you? 11 A. No. 12 Q. Now, No. 3, basically kind of what I 13 asked you already. But "Except for any of your 14 attorneys, identify all persons not identified 15 in 1 with whom you have discussed your claims 16 against Defendant." 17 And, again, down here on the 18 answer you list your "EEOC investigators," and 19 that's fine. And then you list "Jason Smith." 20 And then the next sentence is, "discussions were 21 on the phone and in my home." 22 Did you have Mr. Smith in your 23 home to talk about your claims against 24 Defendant?</p>
<p style="text-align: right;">251</p> <p>1 And what information would he 2 have regarding discrimination with respect to 3 discipline? 4 A. He would have not just the 5 information, but the actual dates, the times, 6 the occurrences, the repetitive nature. He 7 would have the extensive -- or plethora of 8 information as it related to the allegations, 9 the discriminatory practices on behalf of the 10 department against the black officer, the 11 pervasive nature, the retaliatory nature. He 12 would have everything. 13 Q. All right. 14 On C it just kind of lists 15 documents that you answer that you think are 16 relevant to your claims. 17 What I want to ask, as you sit 18 here today -- and we talked kind of about those 19 EEOC charges, and I don't think I have all of 20 them. 21 But as you sit here today, 22 Mr. Chapman, are there any documents in your 23 possession that you think are relevant to your 24 claims that you haven't turned over to your</p>	<p style="text-align: right;">253</p> <p>1 A. No. I was on the phone at home. So 2 there was times where I was at the phone mobile 3 where I was out of my home and the phone at 4 times -- 5 Q. All right. Did the EEOC investigators 6 ever come to your home? 7 A. No. No. I don't think they do 8 home visits. 9 Q. That would shock and awe me. 10 Okay. Still on the answer 11 here, No. 3, it says -- it's after the semicolon 12 there on the one, two, third line. "And why the 13 Chief Judge and his designees refuse to address 14 the claims of such officers." 15 Do you see that? 16 A. Yes. 17 Q. Yeah. Who are the designees you're 18 referring to here? Is that who we talked about 19 already? 20 A. Keith Seveck and Kate Galbraith. 21 Q. Okay. 22 A. It's also dealing with management. 23 Going through the steps of the grievance 24 process. Those are his designees, the director.</p>

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<p style="text-align: right;">254</p> <p>1 Q. And here it also says, "A written 2 grievance was filed and presented to the Office 3 of the Chief Judge." 4 Do you know which grievance 5 that's referring to there? 6 A. You can pick one, but they're all 7 relevant to these proceedings. 8 Q. Okay. Yeah. 9 A. And I'm not being facetious when I say 10 "that." I'm just saying there was just so many. 11 Q. Oh, no, no. I didn't think you were. 12 When you filed this lawsuit -- 13 I'm kind of looking at No. 4. But when you 14 filed this lawsuit, you were still in the 15 Jumpstart program; is that right? 16 A. Yes. 17 Q. You were still working in the 18 Jumpstart program? 19 A. Yes. 20 Q. All right. 21 A. That's where the relevancy of scrutiny 22 also marks. Because after we filed it, there 23 was a lot more scrutiny placed on us in the 24 Jumpstart program from --</p>	<p style="text-align: right;">256</p> <p>1 but where you answer in bold at the top here. 2 Do you see that? 3 A. Yes. 4 Q. Do you have the highlighted one? 5 A. Yes. 6 Q. You shouldn't have the highlighted 7 one. I should have the highlighted one. Not 8 that it matters that much, but that's just like 9 -- 10 MR. GEOGHEGAN: Off the record. 11 (WHEREUPON, a discussion 12 was held off the record.) 13 BY MR. HAYES: 14 Q. Okay. So it's going to be -- they are 15 not numbered, but it's going to be the top of 16 Page 3, which is your answer to No. 4. It 17 starts "previously." Do you see that, 18 Mr. Chapman? 19 A. What number -- interrogatory No. 4? 20 Q. No. 4, the answer. Yes. It says 21 "previously" at the top. 22 A. Okay. All right. I got you. 23 Q. Okay. I just want you to look that 24 answer over real quick.</p>
<p style="text-align: right;">255</p> <p>1 Q. And I should probably know this, but 2 when did -- do you know when you filed the 3 original complaint? 4 A. I believe it was two thousand and -- 5 was it 2014, I believe. '13, '14. I think it 6 was 2014, I believe. 7 Q. Okay. 8 A. Maybe -- 9 MR. GEOGHEGAN: '15. 10 MR. HAYES: '15, yeah. 11 THE WITNESS: '15. 12 BY MR. HAYES: 13 Q. I can look at the number, but do you 14 know approximately when in 2015? 15 If you know, it's fine. I 16 mean, it's public record. I can look it up. 17 But if you have it in your head, that would be 18 nice. 19 A. No, I don't. 20 Q. Okay. That's fine. 21 A. I just know we filed it as soon as we 22 could. 23 Q. All right. And No. 4 is talking about 24 Jumpstart. Are you on -- the page is not marked</p>	<p style="text-align: right;">257</p> <p>1 A. Oh, okay. 2 Q. Please. 3 A. Okay. 4 Q. All right. 5 In the first paragraph, does 6 it effectively reflect what your job duties were 7 in Jumpstart? 8 A. Yes. There's -- there's additional 9 but that's -- that's -- this is one of the 10 duties. But go ahead. Okay. 11 Q. Well, what are the additional duties? 12 A. The mission -- and this is describing 13 the mission of the program, which is correct. 14 Q. All right. 15 And then the next paragraph 16 talks about "no adequate time to train, assigned 17 to be a field probation officer." Do you see 18 that? 19 A. Yes. 20 Q. And we already talked about that, 21 right? 22 A. Yes, we did. 23 Q. Is there anything else you want to add 24 about that?</p>

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<p style="text-align: right;">258</p> <p>1 A. No.</p> <p>2 Q. All right.</p> <p>3 And No. 5, we've talked about</p> <p>4 this one. We went over the complaint, but you</p> <p>5 answer that your information is from Jason</p> <p>6 Smith; is that right?</p> <p>7 A. For?</p> <p>8 Q. For your -- for paragraph -- we can go</p> <p>9 to Paragraph 38 of the complaint.</p> <p>10 A. What's your question?</p> <p>11 Q. Is it still true that your information</p> <p>12 about Paragraph 38 from the complaint comes from</p> <p>13 Jason Smith?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 A. Now, you say your information -- my</p> <p>17 information for --</p> <p>18 Q. What I'm trying to get at is because</p> <p>19 there are allegations in the complaint, and I</p> <p>20 know because we have four Plaintiffs here and so</p> <p>21 it can get, you know, kind of messy. And I just</p> <p>22 want to narrow down as to what specifically Theo</p> <p>23 Chapman's knowledge is of some of these</p> <p>24 allegations. And that's what -- and here,</p>	<p style="text-align: right;">260</p> <p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Can you give me any specific examples</p> <p>4 of your -- in your personal knowledge of when</p> <p>5 harsher language was used in the discipline of</p> <p>6 an African-American officer as compared to a</p> <p>7 white officer?</p> <p>8 A. Yeah. There was an incidence where</p> <p>9 there was an officer who was an adjudicator and</p> <p>10 she was instructed by DCPO Virginia Caulfield to</p> <p>11 stand in in another courtroom -- every Judge</p> <p>12 does things differently.</p> <p>13 Q. Oh, I know.</p> <p>14 A. And so -- so she -- she followed her</p> <p>15 deputy's orders and instructions. At the end</p> <p>16 of the -- at the end of the court call, the</p> <p>17 judge had placed a file instead of right, he</p> <p>18 placed it left. And that minor, as a result,</p> <p>19 was not RUR, which is release upon request, was</p> <p>20 not released for maybe another two hours. So,</p> <p>21 in essence, instead of the minor being released</p> <p>22 at, let's say, 3 o'clock, the minor was released</p> <p>23 at 5:00.</p> <p>24 The DCPO located the error,</p>
<p style="text-align: right;">259</p> <p>1 that's what the interrogatory is asking, and</p> <p>2 your answer is that "I got it from Jason Smith."</p> <p>3 Is that right?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 No. 6, is that the same thing?</p> <p>7 The information from Paragraph 32 of the</p> <p>8 complaint comes from Jason Smith; is that right?</p> <p>9 A. Yes. Yes.</p> <p>10 Q. All right. Is that the same thing,</p> <p>11 your information comes from Jason Smith?</p> <p>12 A. Yes.</p> <p>13 Q. All right.</p> <p>14 All right. No. 8, I want to</p> <p>15 focus -- I know we talked about this in the</p> <p>16 complaint, but what I want to focus on is the</p> <p>17 second paragraph of your answer. "The language</p> <p>18 used in disciplines of African-American officers</p> <p>19 is harsher than language used for the same</p> <p>20 offenses committed by white officers; and the</p> <p>21 language used in disciplining white officers for</p> <p>22 the same offense is typically less harsh, so as</p> <p>23 to justify either a more lenient punishment or a</p> <p>24 verbal reprimand or no punishment."</p>	<p style="text-align: right;">261</p> <p>1 but instead of thanking the officer for working</p> <p>2 and doing what she requested, that officer was</p> <p>3 then brought up on disciplinary charges for</p> <p>4 neglective duties. Subsequently, they were</p> <p>5 trying to suspend her for five days, but out of</p> <p>6 the kindness of their hearts they only suspended</p> <p>7 her three for following the directives of her</p> <p>8 DCPO and not being liable for what a judge does.</p> <p>9 Then now -- that's an African</p> <p>10 American. Now it shifted. You have this white</p> <p>11 officer who was given an RUR, specifically, that</p> <p>12 this minor -- by the judge, that this minor was</p> <p>13 not to be released to his mother who was on</p> <p>14 drugs, who also had instances where she owed</p> <p>15 drug dealers money, and she had affiliations</p> <p>16 with a gang that, for all intentional purposes,</p> <p>17 was placing her and the minor's life in danger,</p> <p>18 which is why the judge did not want the minor</p> <p>19 released to her.</p> <p>20 Paula Shanahan changed the</p> <p>21 judge's RUR and put the mother down as the minor</p> <p>22 to be released to the mother. Paula Shanahan is</p> <p>23 white. That minor eventually ended up getting</p> <p>24 shot seven times. Nothing happened to her. Not</p>

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<p style="text-align: right;">262</p> <p>1 even a write-up.</p> <p>2 Q. When did these two incidents happen,</p> <p>3 if you know?</p> <p>4 A. Paula Shanahan was the more recent.</p> <p>5 That had to have happened in the last, maybe,</p> <p>6 year and a half. The issue with the</p> <p>7 adjudicator, that had to have been maybe --</p> <p>8 maybe -- I want to say almost -- it had -- time</p> <p>9 flies. It may have been almost two years now,</p> <p>10 I'm thinking.</p> <p>11 Q. Okay.</p> <p>12 A. But I was a steward at the time, and</p> <p>13 that was one of the most heart-wrenching things</p> <p>14 because the lady had no -- she had a perfect</p> <p>15 personnel file. Not one write-up. Exceeded.</p> <p>16 Q. And what's the name of that -- of that</p> <p>17 woman?</p> <p>18 A. I forgot her name right now. I didn't</p> <p>19 even know she was a PO. She was just that</p> <p>20 much -- just coming every day doing her job.</p> <p>21 Q. And you were involved in that -- in</p> <p>22 that discipline as a union steward?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Were you involved in the Paula</p>	<p style="text-align: right;">264</p> <p>1 Q. So just to be clear on Paula Shanahan,</p> <p>2 Mr. Smith told you she wasn't disciplined,</p> <p>3 right?</p> <p>4 A. She was not. Yes.</p> <p>5 Q. And then you have not seen any records</p> <p>6 where she was disciplined, right?</p> <p>7 A. Not a one.</p> <p>8 Q. Okay. And you were reviewing</p> <p>9 disciplinary records?</p> <p>10 A. As I was working on cases, yes. Yes.</p> <p>11 Q. As a union steward, is that when you</p> <p>12 --</p> <p>13 A. As a union steward, yes.</p> <p>14 Q. Okay.</p> <p>15 A. It's a voluntary thing. So you don't</p> <p>16 want to just be looking through disciplinary</p> <p>17 records, if it's not something that you have to</p> <p>18 do. Being a steward is not -- you don't get</p> <p>19 paid for it.</p> <p>20 Q. Okay. Let's get No. 9, which is the</p> <p>21 bottom there. And then it's asking about the</p> <p>22 supervisory exam, which I think we've covered in</p> <p>23 detail.</p> <p>24 A. Yeah. Oh, yeah.</p>
<p style="text-align: right;">263</p> <p>1 Shanahan?</p> <p>2 A. It never made it to -- it never made</p> <p>3 it to a discipline.</p> <p>4 Q. And how do you know about that?</p> <p>5 A. I'm familiar with that because that</p> <p>6 information -- again, that's -- former President</p> <p>7 Jason Smith was made aware of that information.</p> <p>8 Q. And he shared it with you?</p> <p>9 A. Of course, yes.</p> <p>10 Q. All right.</p> <p>11 Do you have any firsthand</p> <p>12 knowledge of Paula Shanahan? We'll call it the</p> <p>13 "Paula Shanahan incident." Do you have any</p> <p>14 firsthand knowledge of that?</p> <p>15 A. That the kid who got shot, it was on</p> <p>16 the -- it made the news.</p> <p>17 Q. But do you have any firsthand</p> <p>18 knowledge of her receiving or not receiving</p> <p>19 discipline, other than from Mr. Smith?</p> <p>20 A. Other than Mr. Smith. But there's no</p> <p>21 record of her ever being disciplined for that.</p> <p>22 Even the records that were requested, there's no</p> <p>23 record of her ever being disciplined for that.</p> <p>24 Good luck.</p>	<p style="text-align: right;">265</p> <p>1 Q. Where you're saying Michael Porter was</p> <p>2 allowed to review it, right?</p> <p>3 A. Right.</p> <p>4 Q. Okay.</p> <p>5 A. And he found an error on their part.</p> <p>6 Q. But he still wasn't passed, right?</p> <p>7 A. Still did not pass. They just told</p> <p>8 him to take it again.</p> <p>9 Q. And was this the 2012 test or a more</p> <p>10 recent one?</p> <p>11 A. This was the two thousand and -- the</p> <p>12 first one.</p> <p>13 Q. Seven?</p> <p>14 A. I think it was 2007. I think it was</p> <p>15 that one.</p> <p>16 Q. Okay. We've covered most of that.</p> <p>17 Let's look at No. 10, and I</p> <p>18 want you to look at your answer for that.</p> <p>19 A. Okay.</p> <p>20 Q. All right.</p> <p>21 And I think you testified</p> <p>22 pretty much in accord with this, but is there</p> <p>23 anything else that you want to add to this</p> <p>24 answer?</p>

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<p style="text-align: right;">266</p> <p>1 A. It was just -- I think it was one 2 question I recall. It was really -- again, it 3 was so subjective. 4 If you walked into a room and 5 two -- two employees were having a verbal 6 disagreement, and then the answers were what 7 would you do as a supervisor? Would you kind of 8 sit the officers down and ascertain what the 9 disagreement was about to try to resolve it? 10 Would you notify management immediately and 11 proceed with discipline -- with a disciplinary 12 investigation? 13 That's -- that's, you know -- 14 and then there was one other answer that was 15 specifically management. And I forgot -- and I 16 forgot what that was. But it was not -- it 17 wasn't a question that -- where it was testing 18 your ability as a supervisor. It was more so 19 looking at would you be pro-management and 20 directing these officers for discipline. 21 Q. Okay. Yeah. 22 And here it says -- it's the 23 second paragraph. "Clerical employees who are 24 largely white." It's the second line of the --</p>	<p style="text-align: right;">268</p> <p>1 A. Yes. 2 Q. Okay. 3 So we might as well -- when 4 you say "management," who are you referring to? 5 A. I'm referring to Avik Das and his 6 assistants, which are DCPOs, deputy chief 7 probation officers. 8 Q. I see. 9 And Mr. Patterson who is in 10 human resources? 11 A. Right. He was a DCPO of human 12 resources. 13 Q. Oh, he's a DCPO? Okay. 14 A. Yeah. He's a DCPO. 15 Q. And he's not the only African-American 16 DCPO, right? 17 A. No. 18 Q. All right. 19 All right. 11 is the next 20 one, and that's just the job training. And I 21 believe we've already talked about that. And it 22 was the March 2011 San Antonio, Texas training, 23 right? 24 A. Right.</p>
<p style="text-align: right;">267</p> <p>1 second paragraph. 2 Is that what you were 3 referring to earlier -- 4 A. I was. 5 Q. -- the clinical employees? 6 A. Those -- those questions. 7 Q. Same employees you were talking about? 8 A. Yeah. They would definitely know what 9 to look for when they saw those questions. 10 Q. Okay. 11 And then right after that -- 12 and says -- it says, "and because it leaves the 13 determination of right or wrong answers to the 14 subjective beliefs of management." 15 Do you see that? 16 A. Yes. 17 Q. All right. 18 And there are African 19 Americans in management, right? 20 A. Yes. 21 Q. Okay. 22 Would you be referring -- I 23 just want to be clear. Is Mr. Patterson someone 24 you're referring to in management?</p>	<p style="text-align: right;">269</p> <p>1 Q. That goes on to -- yeah. That goes on 2 to the top of the next page. I just want to 3 make sure we're on the same page here. 4 A. No. That's fine. I was just asking 5 about something you said. That's all. 6 Q. Okay. 7 Is there anything else you 8 want to add about that, that we haven't talked 9 about? 10 A. No. No. Just in reference to your 11 noting that Mr. Patterson is African American -- 12 Q. Uh-huh. 13 A. -- and there are other 14 African-American DCPOs. But that's -- that does 15 not negate them from discriminating. Whereby 16 there's a practice of those that are appointed, 17 they perpetuate discriminatory practices that 18 benefit whites while at the same time punishes 19 African Americans. So it does not remove them 20 from that. 21 Q. Okay. 22 A. Period. That was it. 23 Q. That's all right. 24 Then back to 11, the training,</p>

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<p style="text-align: right;">270</p> <p>1 your answer, I want you to focus on that. I</p> <p>2 want to make sure we're on the same page here,</p> <p>3 literally.</p> <p>4 Is it -- that answer that you</p> <p>5 gave there, I just want to make sure there's</p> <p>6 nothing that you want to add that we haven't</p> <p>7 talked about regarding your denial of comp time</p> <p>8 for that March 2011 training.</p> <p>9 A. No. That's good.</p> <p>10 Q. All right.</p> <p>11 And then 12 is the --</p> <p>12 continuing on that training, I believe you</p> <p>13 already mentioned these two individuals, right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay.</p> <p>16 You said Richard Tekip; is</p> <p>17 that right?</p> <p>18 A. Tekip.</p> <p>19 Q. He went to that training as well?</p> <p>20 A. No. No. Not that training. He was</p> <p>21 in the unit before -- before Jumpstart became</p> <p>22 under the umbrella of DCPO Neal, he was already</p> <p>23 in educational advocacy, and they were already</p> <p>24 going to these different trainings, and they</p>	<p style="text-align: right;">272</p> <p>1 A. Yes. It's -- he put it. Avik Das</p> <p>2 told us in a meeting that I was not being</p> <p>3 removed because I had filed a lawsuit.</p> <p>4 Q. Okay. Was that in response to you</p> <p>5 saying you were being removed because of a</p> <p>6 lawsuit?</p> <p>7 A. No. I don't think it was that.</p> <p>8 Q. All right.</p> <p>9 That would have been when?</p> <p>10 October or November of 2015?</p> <p>11 A. That would have been around October</p> <p>12 prior to that November removal.</p> <p>13 Q. All right.</p> <p>14 We already talked about the --</p> <p>15 there were three employees who remained in</p> <p>16 Jumpstart, right, who -- after you and</p> <p>17 Mr. Nelson were reassigned?</p> <p>18 A. Right.</p> <p>19 Q. We have -- kind of been talking about</p> <p>20 Lomax, O'Connell, Jackson.</p> <p>21 A. O'Connell was just brought on.</p> <p>22 Q. Sorry.</p> <p>23 A. It was Jackson, Lomax, and Harris.</p> <p>24 Q. Oh, Harris. Okay. Sorry.</p>
<p style="text-align: right;">271</p> <p>1 were receiving comp time.</p> <p>2 Q. So but he -- going directly to the San</p> <p>3 Antonio training, he did not go to that, right?</p> <p>4 A. He was not at that.</p> <p>5 Q. But Carolyn Conway did?</p> <p>6 A. Yes.</p> <p>7 Q. All right. Got it.</p> <p>8 Thirteen is talking about</p> <p>9 Paragraph 70 of your complaint, which we</p> <p>10 covered. It was how your reassignment outside</p> <p>11 of Jumpstart and how your allegation is that you</p> <p>12 didn't receive adequate training, right?</p> <p>13 A. Right.</p> <p>14 Q. Okay.</p> <p>15 Look at your answer and let me</p> <p>16 know if there's anything else that we haven't</p> <p>17 talked about or you want to add to it.</p> <p>18 A. It just was -- yeah. It just noted</p> <p>19 that it was ironic that during one of the labor</p> <p>20 meetings when Avik made the statement, "You all</p> <p>21 are not being removed because of the lawsuit."</p> <p>22 That was kind of ironic that he would mention</p> <p>23 that.</p> <p>24 Q. Does that say that in here?</p>	<p style="text-align: right;">273</p> <p>1 A. Yusef Harris. Yusef Harris. You</p> <p>2 remember that name?</p> <p>3 Q. Yes. I do remember Yusef now.</p> <p>4 A. Mr. O'Connell was just recently was</p> <p>5 sent to the --</p> <p>6 Q. When was Yusef in the unit?</p> <p>7 A. He was -- he came in after Tekip left.</p> <p>8 I think Tekip left around 2009.</p> <p>9 Q. All right. Okay.</p> <p>10 A. He was an outreach officer because</p> <p>11 there was -- remember the Jumpstart program had</p> <p>12 the instruction part and outreach.</p> <p>13 Q. Yeah.</p> <p>14 And Yusef remained in</p> <p>15 Jumpstart after November 2015?</p> <p>16 A. Yes. He's still there.</p> <p>17 Q. Okay. Did we get his race? I don't</p> <p>18 remember.</p> <p>19 A. He's African American.</p> <p>20 Q. Okay.</p> <p>21 If you know, did Yusef have</p> <p>22 more or less seniority than you?</p> <p>23 A. He has more seniority as it relates to</p> <p>24 having been in the department -- employed with</p>

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<p style="text-align: right;">274</p> <p>1 the department longer than me. As it relates to</p> <p>2 Jumpstart, I had more seniority in that unit.</p> <p>3 Q. All right.</p> <p>4 Did the other individuals we</p> <p>5 talked about -- so Lomax, you had more</p> <p>6 seniority, right? Total seniority.</p> <p>7 A. Yeah. Lomax had just came out of</p> <p>8 training.</p> <p>9 Q. And Ms. Jackson, the same way?</p> <p>10 A. Yeah. She had just came out of the</p> <p>11 field in the three years -- two years. Two or</p> <p>12 three years. Yeah.</p> <p>13 Q. Okay.</p> <p>14 A. So the irony in that was if you talk</p> <p>15 about operational need and you need to place</p> <p>16 some officers in a field unit, how was it that</p> <p>17 you just had an officer who has three years in</p> <p>18 the field, but you removed them out and placed</p> <p>19 officers who had no field experience?</p> <p>20 Q. You're talking about Ms. Jackson?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So she had been a field</p> <p>23 probation officer before?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">276</p> <p>1 A. They play with titles.</p> <p>2 Q. All right.</p> <p>3 No. 14, that is the next page,</p> <p>4 Mr. Chapman. Are we on -- I don't know if you</p> <p>5 turned the page.</p> <p>6 A. Yes.</p> <p>7 Q. Okay. All right.</p> <p>8 I want you to look at the</p> <p>9 second paragraph. "I was forced into the field</p> <p>10 service position for operational need when a</p> <p>11 less senior white female coworker was permitted</p> <p>12 to transfer out of the field service unit into</p> <p>13 electronic monitoring -- a position I would have</p> <p>14 preferred."</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Is that what you were talking about</p> <p>18 before?</p> <p>19 A. Yes. Patty Calderon.</p> <p>20 Q. And you thought she might have gone to</p> <p>21 IPS, but here it says EM; is that right?</p> <p>22 A. EM.</p> <p>23 Q. Okay.</p> <p>24 And you would rather go to</p>
<p style="text-align: right;">275</p> <p>1 Q. And then went to Jumpstart?</p> <p>2 A. Yes.</p> <p>3 Q. And then you were taken out of</p> <p>4 Jumpstart but she wasn't, right?</p> <p>5 A. Correct.</p> <p>6 Q. Yeah.</p> <p>7 What was your official job</p> <p>8 title when you were working in Jumpstart?</p> <p>9 A. Jumpstart instructor.</p> <p>10 Q. And if you know, what was</p> <p>11 Ms. Jackson's title prior to the reassignment?</p> <p>12 A. Jumpstart instructor.</p> <p>13 Q. She was, too. Okay.</p> <p>14 And I assume Mr. Nelson was</p> <p>15 Jumpstart instructor?</p> <p>16 A. Jumpstart instructor.</p> <p>17 Q. And at the time, 2015, were there any</p> <p>18 other individuals with the title Jumpstart</p> <p>19 instructor?</p> <p>20 A. No.</p> <p>21 Q. Do you know if Ms. Jackson is still --</p> <p>22 if her title is still Jumpstart instructor?</p> <p>23 A. No. I don't know.</p> <p>24 Q. You don't know. Okay.</p>	<p style="text-align: right;">277</p> <p>1 electronic monitoring?</p> <p>2 A. I would like to.</p> <p>3 Q. Have you put in a bid on electronic</p> <p>4 monitoring?</p> <p>5 A. If they told me I needed to bid out,</p> <p>6 considering I was forced in under operational</p> <p>7 needs, I would have.</p> <p>8 Q. I'm sorry.</p> <p>9 Did you bid on an electronic</p> <p>10 monitoring position?</p> <p>11 A. I never bidded on it. No.</p> <p>12 Q. Okay.</p> <p>13 A. Just to add to that, which I didn't</p> <p>14 do. After Ms. Calderon was permitted to leave,</p> <p>15 I was then given her files, her caseload.</p> <p>16 Q. All of them?</p> <p>17 A. Half. Half of her 25 went to me and</p> <p>18 another half went to another African-American</p> <p>19 officer.</p> <p>20 Q. Okay. And Ms. Calderon is white; is</p> <p>21 that right?</p> <p>22 A. Yes.</p> <p>23 Q. All right.</p> <p>24 And do you know -- if you</p>

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<p style="text-align: right;">278</p> <p>1 know. Don't speculate. But if you know, did 2 Ms. Calderon bid on that position to go to the 3 EM unit? 4 A. From -- 5 Q. I don't know what you mean. 6 A. Just a small tidbit. 7 Q. Sure. 8 A. Her mom works for William Patterson in 9 the HR department, and the way I understand it, 10 it was insider information. So she knew to go 11 ahead and bid it and so they created the 12 position. 13 Q. Okay. Okay. Let's jump down to 15 14 here, and we're moving on to the final portion 15 of the deposition here. Okay. 16 So just to kind of make clear 17 to you where I'm kind of going here. What I 18 want to kind of suss out here is that -- the 19 claim of damages in this case. So just answer 20 as best you can to what you're claiming here. 21 So that's kind of where these questions are 22 going. 23 So No. 15 is asking you for 24 any medical, psychological, or psychiatric --</p>	<p style="text-align: right;">280</p> <p>1 thing? 2 A. No. It's more so informal. 3 Q. Okay. And how do you know 4 Ms. Jackson? 5 A. Ms. Jackson -- 6 Q. Different Ms. Jackson, right? 7 A. Yeah. Different Ms. Jackson. 8 Q. Gwenn Jackson. 9 A. Gwen Jackson. 10 Q. Two N's on Gwenn. 11 A. She -- she runs the actual ministry at 12 the church also that it deals with. Because she 13 deals with a lot of trauma in her job. 14 Q. And what's her job? 15 A. She works at the hospital. I think 16 she works in the actual trauma unit, and I think 17 she's a supervisor. Real very knowledgeable and 18 thorough. So she's dealt with a lot more severe 19 cases of not even just what I'm going through 20 but just what I'm going through. 21 Q. All right. 22 So you talked to Nurse Jackson 23 in more of an informal setting about what you 24 have been going through?</p>
<p style="text-align: right;">279</p> <p>1 basically treatment or anything that you've 2 received since November 2007. And then your 3 answer begins on the next page. It says, 4 "Reverend Dr. Dale A. Lawson Sr., Pastor Christ 5 Temple Baptist Church, where the congregation 6 have provided support, spiritual guidance, 7 counseling, prayers and a support group 8 throughout this ordeal." 9 Do you see that? 10 A. Yes. 11 Q. Okay. Is that any type of medical 12 treatment or anything like that that you're 13 receiving there? 14 A. Not from my pastor. 15 Q. Right. We'll get to the next one. So 16 yeah. 17 Then you say, "Nurse Gwenn 18 Jackson has provided ongoing counseling for 19 emotional distress I've been subjected to as a 20 result of the conduct alleged in the complaint." 21 All right. Is it -- are you 22 seeing Nurse Gwenn Jackson in -- I guess, is it, 23 like, a formal, kind of doctor/patient 24 arrangement? Or is it more of an informal</p>	<p style="text-align: right;">281</p> <p>1 A. Yes. Well, it's more so informal 2 because we do it at the church. She also makes 3 it available for -- you know, if you need to 4 reach her on the phone. 5 Q. She's not a therapist, right? 6 A. No. 7 Q. Okay. Or a psychologist? 8 A. No. 9 Q. She's not a psychiatrist? 10 A. No. She's just a caring person. 11 Q. Okay. 12 All right. You say and write 13 still here emotional distress. Do you see that? 14 A. Yes. 15 Q. Can you describe what emotional 16 distress you're alleging to have suffered as a 17 result of your allegations in the complaint? 18 A. There's days where -- when I'm dealing 19 with this -- this -- this madness, there was 20 days when you -- you get home and you're -- 21 you're up and down. You're angry. You're 22 frustrated. You know, you feel alone. You 23 know, you want -- you know, you want to release 24 somehow. You're mad at the world. You're</p>

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<p style="text-align: right;">282</p> <p>1 also -- you want to be forgiving. You want to 2 hope that these people aren't just -- not just 3 truly this evil and that they just do this just 4 for kicks or just because. 5 So, you know, all of these 6 things play out in your mind as you're trying to 7 compartmentalize these things. And the more I 8 witnessed it the more it just became that much 9 more distressful. Because it's like, you know, 10 you see people always come together when there 11 is natural disasters. Race doesn't matter. 12 Where this white community totally wiped out by 13 a hurricane or tornado. But then you see this 14 going on at work and you're like, "Why?" 15 So it does -- it affects you 16 emotionally. It affects, you know, my marriage. 17 It affects my family. You know, you become 18 isolated. It has a trickle-down effect. 19 Q. Outside of these two individuals, 20 Reverend and Nurse Jackson, are you seeing any 21 other medical professional? 22 A. I saw my doctor, Dr. Abraham Matthew. 23 Q. And is he an internist? 24 A. No, no. He's a family practitioner.</p>	<p style="text-align: right;">284</p> <p>1 weight. And when I lost -- 2 Q. When was that? 3 A. It had to be, like, around two 4 thousand and, I think, '11. Yeah. 2010, 2011. 5 Q. Okay. 6 A. I was hit in an accident, and I 7 couldn't work out, and I used to be a lot more 8 buff than this. And when you can't work out, 9 muscle tends to what? Turns into fat. And 10 levels started shooting up, cholesterol, 11 everything. 12 So after I lost the weight, I 13 had no problems. And then when this stuff 14 started, my blood pressure was just -- it wasn't 15 due to weight. It wasn't due to -- it was 16 just -- couldn't figure it out. 17 Q. Okay. Any other -- other than high 18 blood pressure, any other, like, medical 19 symptoms that you are alleging you suffered 20 because of your allegations? 21 A. Anxiety. Sometimes sleepless nights, 22 but I didn't -- thank goodness I didn't have to 23 take any medication for that. That was kind 24 of -- kind of, you know --</p>
<p style="text-align: right;">283</p> <p>1 Q. Okay. 2 And -- okay. So you saw Dr. 3 Matthew? 4 A. Yeah. For awhile, you know, high 5 blood pressure had ran in my family. I had lost 6 weight after -- and I was totally managed. That 7 was totally managed. But then when I started 8 going through this, it's like my -- you know, my 9 blood pressure was just -- it was going up and 10 there was no reason for it because I worked out, 11 golfed. My job -- I'm very, you know, outgoing. 12 And he just couldn't understand why when I come 13 in for my checkups and stuff, my blood pressure 14 would be high. So I -- 15 Q. When was this? 16 A. It was throughout -- throughout this 17 time from '14, '15. Even up until probably the 18 middle of last year have -- have I now kind of 19 gotten it to where I can take the medicine on an 20 as-needed basis. But during that time it was -- 21 Q. Were you taking your blood pressure 22 medicine prior to that? 2014. 23 A. When I initially was prescribed blood 24 pressure medicine because, you know, I had the</p>	<p style="text-align: right;">285</p> <p>1 Thank goodness for Google or 2 You Tube. There's some helpful information on 3 how sometimes when you're dealing with some 4 things that aren't necessarily caused by 5 genetics or -- but sometimes external factors. 6 I found some teas and 7 different things like that and ways to kind of 8 sit in the tub for an hour or two or whatever 9 just letting, you know, kind of relaxation kick 10 in. So there's ways that I found to counter it 11 without medication. 12 Q. Okay. 13 Any other medical treaters 14 that you were seeing for any emotional distress 15 or anything like that? 16 A. No. You laughed when I said I was a 17 lot more buff than this. 18 Q. Well, I can't tell in that very fancy 19 suit you're wearing. 20 A. No, no. Okay. 21 Q. All right. 22 Okay. We're almost done. I 23 want to go through a few more questions. 24 A. All right.</p>

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<p style="text-align: right;">286</p> <p>1 Q. Currently employed at JPD, right?</p> <p>2 A. Yes.</p> <p>3 Q. What is your current salary?</p> <p>4 A. I'm -- I think I'm right around, like,</p> <p>5 72, 73.</p> <p>6 Q. 72 or 73,000 per year?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay.</p> <p>9 And is that more than when you</p> <p>10 left Jumpstart in November 2015?</p> <p>11 A. Yes. Yes.</p> <p>12 Q. Okay. So you received a raise or</p> <p>13 raises?</p> <p>14 A. Yes. I have received a raise.</p> <p>15 Q. Just one?</p> <p>16 A. The union in our last contract had</p> <p>17 negotiated.</p> <p>18 Q. That was going to be my next question.</p> <p>19 So it was contractually negotiated raises?</p> <p>20 A. Yes.</p> <p>21 Q. Would you have received those raises</p> <p>22 if you were still in Jumpstart, you think, if</p> <p>23 you know?</p> <p>24 A. Yes. That's different than merit.</p>	<p style="text-align: right;">288</p> <p>1 straight time for the time you were in San</p> <p>2 Antonio; is that what you are referring to</p> <p>3 there?</p> <p>4 A. Right.</p> <p>5 Q. Okay. Anything else for the</p> <p>6 out-of-state job training compensation that</p> <p>7 you're asking for there?</p> <p>8 A. I believe that was it.</p> <p>9 Q. All right.</p> <p>10 Okay. Jump to Page 23, under</p> <p>11 Count 2, which is your retaliation claim.</p> <p>12 Paragraph 83(a) says, "Order their reinstatement</p> <p>13 to positions within the Jumpstart program."</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. So is that a true statement that you</p> <p>17 want to be reinstated to the Jumpstart program?</p> <p>18 A. To Jumpstart or something -- something</p> <p>19 compensory [sic].</p> <p>20 Q. And what would be compensory [sic] to</p> <p>21 the Jumpstart program?</p> <p>22 A. That's negotiable.</p> <p>23 Q. All right.</p> <p>24 A. Or give me a nonsupervisory III, which</p>
<p style="text-align: right;">287</p> <p>1 Q. Right.</p> <p>2 A. That's part of the CBA.</p> <p>3 Q. All right. Okay.</p> <p>4 All right. We're going to</p> <p>5 jump just a little bit between the complaint and</p> <p>6 the interrogatories. So just a couple more.</p> <p>7 Complaint, I want to go to 22.</p> <p>8 Paragraph 22, not Page 22. No, sorry. It is</p> <p>9 Page 22. I'm sorry.</p> <p>10 Page 22. And Paragraph G,</p> <p>11 middle of the page there. It says, "Grant</p> <p>12 damages to Plaintiff Nelson and Chapman and</p> <p>13 other African-American juvenile probation</p> <p>14 officers who were denied compensation for</p> <p>15 out-of-state job training."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. All right.</p> <p>19 And is -- I just want to be</p> <p>20 clear. When you are asking for the compensation</p> <p>21 for out-of-state job training, is that to get</p> <p>22 those 1.5 hours? Sorry. I'm saying that</p> <p>23 inartfully.</p> <p>24 To get comp time rather than</p>	<p style="text-align: right;">289</p> <p>1 is a position that I can actually be able to</p> <p>2 create something that is beneficial.</p> <p>3 Q. If you were reinstated to somewhere in</p> <p>4 the Jumpstart program, if you know, would you be</p> <p>5 making the same salary?</p> <p>6 A. Yes.</p> <p>7 Q. All right.</p> <p>8 And a PO III, that would be</p> <p>9 your -- would that be an increase in salary?</p> <p>10 A. Nonsupervisory III, nonsupervisory PO</p> <p>11 III.</p> <p>12 Q. Would that be an increase in salary?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 Are there other nonsupervisory</p> <p>16 PO IIIs?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And what do they do?</p> <p>19 A. Corolla Scott has a technical skill.</p> <p>20 She has IT skills.</p> <p>21 Q. And what's her name? Sorry.</p> <p>22 A. Corolla Scott. And I think --</p> <p>23 Q. Race?</p> <p>24 A. She's African American, but I think</p>

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<p style="text-align: right;">290</p> <p>1 there may be -- I don't know that they -- I 2 think there may be one or two others. I don't 3 know their names, but I think they're white. 4 Q. All right. 5 So it's not a lot of 6 nonsupervisory POs right now? 7 A. Not now. They have removed them but 8 not now. 9 Q. Okay. 10 A. We have -- 11 Q. All right. I just want to focus on 12 the Jumpstart program. 13 Do you know -- is there a 14 specific position that you would want in 15 Jumpstart? 16 A. I was fine with the advocacy position 17 or the outreach position, either one of those. 18 Q. All right. 19 And this -- I don't want to 20 change your testimony, but do you know -- are 21 there instructors now in Jumpstart? 22 A. I don't know that there are. 23 Q. You don't know. Okay. 24 A. No. But I would be willing to resume</p>	<p style="text-align: right;">292</p> <p>1 I have one young man, he's a 2 barber. He has his own -- he's opened his own 3 shop now. And this was a young man that was -- 4 at one point because his mom was on drugs, he 5 was stealing stuff to try to provide for his 6 brother. He has a younger brother who had 7 special needs. He called me out of the blue and 8 just thanked me, you know. 9 There was a young man, Ed 10 Rangel (phonetic) who's -- as a result of us, 11 he's involved with the Illinois Juvenile Justice 12 Commission as a junior commissioner. He's an 13 assistant manager at one restaurant, and he's 14 actually a manager at another one. And he's now 15 just called me and Nelson inviting us because 16 he's going to be giving birth to his first 17 child, him and his fiance. 18 These are -- you know, these 19 are things that we just -- we just can't make 20 up. And the list goes on and on. 21 Q. And it's not something that you can 22 get as a field officer? 23 A. Well, you know, my skill sets are 24 going to go wherever I go. They are not just</p>
<p style="text-align: right;">291</p> <p>1 those duties were I placed back in there. 2 Q. All right. 3 And this is going to be 4 relatively open ended, but keep it as brief -- 5 if you can. 6 A. I will do that. 7 Q. Why do you want to go back to 8 Jumpstart? 9 A. Again, just -- it was out of 10 retaliation that I was removed. I still have a 11 relationship with many of those students that 12 have benefited from my mentoring them and the 13 changing of their lives, some of which now have 14 gone on to become very involved individuals in 15 the community and successful. 16 One of the young men, he's 17 managing his own Jimmy John's. Another one has 18 gone on to become an engineer. And I run into 19 these young men and they -- and my number has 20 never changed, so they will call me sometimes 21 out of the blue. In the last year, I ran into 22 four young men who I did not know the impact 23 that I've changed their lives and their 24 families.</p>	<p style="text-align: right;">293</p> <p>1 limited to Jumpstart. Things that I was doing 2 there, I'm still doing. But wherever I go, 3 those skill sets are gonna go. Because you just 4 don't stop caring just because you go from one 5 place to another or forced discriminately. It 6 doesn't matter when you care. 7 Q. Back to interrogatories. 8 A. Sure. 9 Q. No. 18. It should be close to where 10 you were. 11 So this is just asking if you 12 have any other employment and then -- because 13 you're still a JPD employee. And it says you 14 have "sought and obtained part-time work with 15 Monterrey Security." Do you see that? 16 A. Yes. 17 Q. And when did you start with them? 18 A. I have been with Monterrey now, I 19 think, about maybe three -- two, three years. 20 About two or three years. 21 Q. All right. 22 And it says, "in part to pay 23 for legal fees in this matter." 24 A. Definitely.</p>

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<p style="text-align: right;">294</p> <p>1 Q. Is that why you sought outside 2 employment at this time? 3 A. Definitely. 4 Q. That would have been around when you 5 filed your lawsuit? 6 A. Correct. 7 Q. Okay. And how often do you work for 8 them? 9 A. It used to be just during the Bears 10 season. Now it's whenever I can pick up hours 11 because, you know, it's needed. 12 Q. How many hours are you working there? 13 A. It varies. You know, they'll e-mail 14 me with different job availabilities. And if I 15 can work it in, I will. They can e-mail me 16 something -- like, during the summer there's a 17 lot of different concerts that goes on. There's 18 marathons and stuff that happens at different 19 times. It varies. 20 Q. It sounds like it's an event security; 21 is that right? 22 A. Yes. And, you know, you have the 23 Bears and then -- you know, they're contracted 24 with the Bears. And then they are also</p>	<p style="text-align: right;">296</p> <p>1 BY MR. HAYES: 2 Q. So do you see No. 23? 3 A. 23. 4 Q. Last page. The last -- yeah, there 5 you go. 6 Okay. It says, "Describe in 7 detail the basis for any damages you claim to be 8 entitled to, included but not limited to the 9 damages articulated in your Prayer for Relief." 10 And we've already talked about 11 all these. 12 A. Right. 13 Q. And your answer is "I have suffered 14 acute emotional and mental distress from working 15 in a racially hostile work place. I have had 16 physical symptoms including elevated blood 17 pressure, sleeplessness and fatigue." 18 I believe you've mentioned all 19 of these things. Is there anything else that 20 you want to mention in response to that 21 question? 22 A. I didn't -- I didn't put anxiety in 23 there. I didn't put, I guess, angry, isolated, 24 in some instances, less than a human.</p>
<p style="text-align: right;">295</p> <p>1 contracted with other events that goes on -- 2 that go on in and around the Chicago -- 3 Q. Are you going to work this upcoming 4 season then? 5 A. Yeah. Yeah. 6 Q. All right. 7 During the Bears season, how 8 many hours are you getting? 9 A. The game usually starts at noon. So I 10 usually will get there around, like, maybe 11 10:00. And then it's usually over at 5:00. 12 Q. Okay. 13 A. By 5:00. 14 Q. And what do they pay you? 15 A. Twenty bucks an hour. 16 Q. Any other outside employment? 17 A. No. 18 Q. All right. 19 Okay. Let's to go the last 20 page of the interrogatories which would be -- 21 MR. GEOGHEGAN: Are we done soon? 22 (WHEREUPON, a discussion 23 was held off the record.) 24</p>	<p style="text-align: right;">297</p> <p>1 There's days where it's just 2 like, you know, this is -- is this what they 3 went through in the '60s. Probably worse. But 4 it's still here today. 5 Q. Outside of JPD and this part-time 6 security job, do you have any other sources of 7 income? 8 A. No. I'm hoping to be finished with my 9 third book and release it and maybe I can 10 generate some revenue from that. 11 MR. HAYES: Okay. I'm done. Just a 12 minute to review and then we should be good. 13 If you want to go, you can 14 take your break, you can. 15 MR. GEOGHEGAN: I'm okay. 16 (WHEREUPON, a brief pause 17 was held.) 18 MR. HAYES: All right. I think I'm 19 good. 20 All right. I'm done. 21 MR. GEOGHEGAN: Good. No questions. 22 THE REPORTER: Signature? Reserve or 23 waive? 24 MR. GEOGHEGAN: I think so for now.</p>

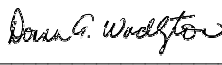

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298	<p>1 THE REPORTER: Reserve?</p> <p>2 MR. GEOGHEGAN: Yes.</p> <p>3</p> <p>4 (WHEREUPON, the deposition</p> <p>5 concluded at 5:07 p.m.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	300	<p>1 ERRATA SHEET</p> <p>2 Examination of: Theodis Chapman</p> <p>3 Date taken: 8-21-17</p> <p>4 Page Line</p> <p>5 _____ Change: _____</p> <p>6 Reason: _____</p> <p>7 _____ Change: _____</p> <p>8 Reason: _____</p> <p>9 _____ Change: _____</p> <p>10 Reason: _____</p> <p>11 _____ Change: _____</p> <p>12 Reason: _____</p> <p>13 _____ Change: _____</p> <p>14 Reason: _____</p> <p>15 _____ Change: _____</p> <p>16 Reason: _____</p> <p>17 _____ Change: _____</p> <p>18 Reason: _____</p> <p>19 _____ Change: _____</p> <p>20 Reason: _____</p> <p>21 _____ Change: _____</p> <p>22 Reason: _____</p> <p>23 Deponent's</p> <p>24 Signature _____ Date _____</p>
299	<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF ILLINOIS</p> <p>3 EASTERN DIVISION</p> <p>4 ANTHONY JORDAN, KENNETH)</p> <p>5 GREENLAW, THEODIS CHAPMAN,)</p> <p>6 and PATRICK NELSON, and a)</p> <p>7 class of unknown persons)</p> <p>8 similarly situated,)</p> <p>9)</p> <p>10 Plaintiffs,)</p> <p>11)</p> <p>12 vs.) No. 15 CV 5907</p> <p>13)</p> <p>14 TIMOTHY EVANS, CHIEF JUDGE) Judge Sara Ellis</p> <p>15 OF THE CIRCUIT COURT OF)</p> <p>16 COOK COUNTY, et al.,)</p> <p>17)</p> <p>18 Defendants.)</p> <p>19</p> <p>20 I hereby certify that I have read the</p> <p>21 foregoing transcript of my deposition given on</p> <p>22 August 21, 2017, consisting of pages 1 through</p> <p>23 303, inclusive, and I do again subscribe and</p> <p>24 make oath that the same is a true, correct and</p> <p>complete transcript of my deposition given as</p> <p>aforesaid, with corrections, if any, appearing</p> <p>on the attached correction sheet(s).</p> <p>_____ Correction sheet(s) attached.</p> <p>_____</p> <p>THEODIS CHAPMAN</p> <p>Subscribed and sworn to</p> <p>before me this _____ day</p> <p>of _____, 2018.</p> <p>Notary Public _____</p>	301	<p>1 ERRATA SHEET</p> <p>2 Examination of: Theodis Chapman</p> <p>3 Date taken: 8-21-17</p> <p>4 Page Line</p> <p>5 _____ Change: _____</p> <p>6 Reason: _____</p> <p>7 _____ Change: _____</p> <p>8 Reason: _____</p> <p>9 _____ Change: _____</p> <p>10 Reason: _____</p> <p>11 _____ Change: _____</p> <p>12 Reason: _____</p> <p>13 _____ Change: _____</p> <p>14 Reason: _____</p> <p>15 _____ Change: _____</p> <p>16 Reason: _____</p> <p>17 _____ Change: _____</p> <p>18 Reason: _____</p> <p>19 _____ Change: _____</p> <p>20 Reason: _____</p> <p>21 _____ Change: _____</p> <p>22 Reason: _____</p> <p>23 Deponent's</p> <p>24 Signature _____ Date _____</p>

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<p style="text-align: right;">302</p> <p>1 STATE OF ILLINOIS) 2) SS: 3 COUNTY OF C O O K) 4 5 I, DONNA WADLINGTON SHAVERS, a 6 Certified Shorthand Reporter within and for the 7 County of Cook and State of Illinois, do hereby 8 certify that heretofore, to-wit, on the 21st day 9 of August, 2017, personally appeared before me 10 at 100 West Randolph Street, 13th Floor, in the 11 City of Chicago, County of Cook and State of 12 Illinois, THEODIS CHAPMAN, produced as a witness 13 for examination in said cause. 14 I further certify that the 15 said witness, THEODIS CHAPMAN, was by me first 16 duly sworn to testify the truth, the whole truth 17 and nothing but the truth in the cause aforesaid 18 before the taking of the examination under oath; 19 that the testimony was reduced to writing in the 20 presence of said witness by means of machine 21 shorthand and afterwards transcribed into 22 typewriting, and that the foregoing is a true 23 and correct transcript of the testimony given by 24 said witness. I further certify that I am</p>	
<p style="text-align: right;">303</p> <p>1 not counsel for nor in any way related to any of 2 the parties to this suit, nor am I in any way 3 interested in the outcome thereof. 4 I further certify that my 5 certificate annexed hereto applies to the 6 original and court-reporter produced copies of 7 transcripts only. I assume no responsibility 8 for the accuracy of any reproduced copies not 9 made under my control or direction. 10 In testimony whereof, I have 11 hereunto set my hand this 15th day of July, 12 2018. 13 14  15 16 DONNA WADLINGTON SHAVERS CSR #084-002443  17 18 19 20 21 22 23 24</p>	

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